

NORTHEAST UTILITIES



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September 13, 1985

Docket Nos. 50-213

50-245

A04858

Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit No. 1
Request for Exemption from 10CFR50.71(e), FSAR Updates

On February 4, 1985,⁽¹⁾ Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) requested an exemption from the schedular requirement of 10CFR50.71(e)(3)(ii) for submittal of an updated Facility Description and Safety Analysis (FDSA) for Haddam Neck and Final Safety Analysis Report (FSAR) for Millstone Unit No. 1. On April 11, 1985,⁽²⁾ the NRC granted an exemption from the requirements of 10CFR50.71(e) for both Haddam Neck and Millstone Unit No. 1 for a period of six months from the date of issuance. Further, the April 11, 1985 letter states that "any additional exemptions from compliance with 10CFR50.71 will be granted by the Director of Licensing, ONRR, only upon the review and approval of a program plan containing schedules or milestones for the submittal of an updated (FSAR)."

In accordance with the provisions of 10CFR50.12, CYAPCO and NNECO hereby request an exemption from the schedular requirements of 10CFR50.71(e). The bases for the exemptions and a discussion of our plan and schedule for addressing 10CFR50.71(e) are provided below.

CYAPCO and NNECO, on behalf of the Haddam Neck Plant and Millstone Unit No. 1, are participating in the NRC's Integrated Safety Assessment Program (ISAP) review. As you are aware, and as described in SECY-84-133, ISAP consists of an integrated evaluation of all outstanding regulatory driven issues, with consideration of utility initiatives, to determine their safety significance and to subsequently develop a long-term integrated schedule for these facilities. Given this definition, one of the issues which should be included in the ISAP

(1) W. G. Counsil letter to J. A. Zwolinski, dated February 4, 1985.

(2) J. A. Zwolinski letter to W. G. Counsil, dated April 11, 1985.

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review is the requirement to update each plant's SAR (or FDSA). For this reason, our proposal⁽³⁾ to the NRC regarding what we believe to be the appropriate scope for the ISAP review specifically identified this issue as a candidate for inclusion in the review. On July 31, 1985,⁽⁴⁾ the NRC concluded the ISAP screening review for these two facilities. Enclosure 2 to the July 31, 1985 letter specifically identifies the FSAR update issue as ISAP Topic No. 1.15 for both Haddam Neck and Millstone Unit No. 1. In this letter, the Staff notes that:

"Enclosure 2 to this letter identifies those projects for each facility that we believe should be evaluated in ISAP. . .The Staff considers the scope of review represented by these topics, in conjunction with the PSA evaluations and updated operating experience evaluations, to be sufficiently comprehensive, such that the results of the integrated assessment will provide effective integrated schedules and the basis for future regulatory actions."

Updating of the FSARs for each facility represents a very significant burden on our engineering resources, estimated at 10,000 man-hours per plant for a minimal update to satisfy 10CFR50.71. We have examined several options for performing the update and concluded that a minimal update, while sufficient to meet the regulations, would not represent a cost-effective option since a minimal update effort would not be as useful within the Northeast Utilities organization for the purpose of day-to-day engineering, design and evaluation activities. This is primarily due to the fact that the Haddam Neck Plant and Millstone Unit No. 1 are among the oldest operating nuclear power plants, and thus the FSARs for these facilities contain far less information in much shallower detail than would be the case for a newer facility. Adoption of a new format for the FSAR such as that prescribed by Regulatory Guide 1.70, while clearly not required, is one option for producing a useful document. Such a radical revision to the FSARs would obviously be a more resource intensive effort, and would thus be even more of a burden on our limited resources, most likely without a commensurate increase in safety. In fact, diversion of an excessive amount of our resources to this issue at the expense of other plant improvement projects could conceivably have the opposite effect.

In its April 11, 1985 letter granting the interim exemption, the Staff states that it "believes that a current (FSAR) is a vital and necessary tool in documenting the design bases of safety systems at the Haddam Neck Plant as well as establishing the bases for future plant modifications and changes to technical specifications."

While CYAPCO and NNECO do not agree that a current FSAR is the only way to accomplish the above objective, we agree with this assessment and fully recognize the importance of an accurate understanding of the plant design bases. As such, we are proposing, without further explicit consideration in ISAP, to update each unit's FSAR (or FDSA) in a manner that will satisfy, and surpass, the requirements of 10CFR50.71(e). While we have not finalized a detailed plan for

(3) J. F. Opeka letter to C. I. Grimes, dated May 17, 1985.

(4) H. L. Thompson letter to J. F. Opeka, dated July 31, 1985.

this effort, there are a number of on-going in-house initiatives which we can describe which are not only related to the FSAR update issue but which we believe will be an integral part of the update effort. These are:

- o CYAPCO is presently performing a reanalysis of the FDSA Chapter 10 transients and accidents for the Haddam Neck Plant. This effort will provide a complete and thorough understanding of emergency system design bases and plant accident response.
- o CYAPCO and NNECO have performed or are performing plant-specific probabilistic risk assessments for both Haddam Neck and Millstone Unit No. 1. These analyses will yield a significant amount of information regarding plant response, risk-significant accident sequences and system success criteria. This information will prove useful in the ISAP process for evaluating proposed plant design changes and in completing the FSAR updating process.
- o Open issues remaining from the SEP program and new safety issues raised during the ISAP screening review will be evaluated and dispositioned during the ISAP review. This information is directly relevant to the FSAR update issue.
- o CYAPCO has contracted with the NSSS supplier for Haddam Neck to develop and document detailed information on the design and licensing bases for selected plant systems. This information would be direct input to an updated FSAR. Consideration is also being given to expanding this effort to our other operating nuclear power plants.
- o The Connecticut Yankee Plant Design Change Task Group (CYPDCTG)⁽⁵⁾ has issued its final report, and has recommended several improvements in the area of configuration control. These recommendations and any resultant corrective actions will be factored into our plans for meeting 10CFR50.71(e).
- o For Millstone Unit No. 1, the Safety Evaluation Report for conversion of the Provisional Operating License (POL) to a Full Term Operating License (FTOL) was recently issued.⁽⁶⁾ This SER contains a large amount of information regarding plant design and operation, including summary descriptions of significant design changes which have been effected since beginning commercial operation. This information will be very useful in the updating process for Millstone Unit No. 1.

Specific plans and schedules for the above described efforts vary depending on the unit involved. It should be noted that most of these efforts are directed not only toward Haddam Neck and Millstone Unit No. 1, but also at Millstone Unit Nos. 2 and 3. Some efforts are being performed concurrently while others are

(5) The role and responsibilities of the CYPDCTG are described in a letter from W. G. Counsil to J. M. Taylor to T. E. Murley, dated January 25, 1985.

(6) J. Zwolinski letter to J. F. Opeka, dated July 26, 1985.

being applied to only one unit at a time. Thus, all of this information may not be available for both Haddam Neck and Millstone Unit No. 1 at the time of submittal of the initial updates. However, subsequent updates will incorporate the results of these and other efforts.

CYAPCO and NNECO plan to submit the initial updates of the FSAR/FDSA for these two facilities by June 20, 1987. This date will allow for completion of the plant-specific probabilistic risk assessments and the majority of the issues to be evaluated in ISAP. This will provide a much more thorough and useful document than would result without that information. Our current evaluation of resource priorities has concluded that completion of this effort on a tighter schedule could be done only at the expense of other, more important projects. Therefore, pursuant to 10CFR50.12, CYAPCO and NNECO request exemptions until June 20, 1987 for complying with the provisions of 10CFR50.71(e).

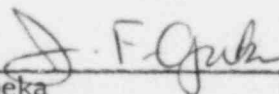
The resource burden associated with this effort will be explicitly considered in our ISAP evaluations and in the development of a long-term integrated schedule. CYAPCO and NNECO fully intend to achieve compliance with 10CFR50.71(e) by June 20, 1987, however, it is conceivable that the results of ISAP may necessitate that resources be dedicated to higher priority work. This must be recognized as a possibility if the objectives of the ISAP program are to be realized. Should it become apparent that further revisions to the planned schedule are warranted, CYAPCO and NNECO will pursue schedular relief through an additional exemption request, as required.

Pursuant to the requirements of 10CFR170.21, enclosed is the application fee of \$300.00.

We trust the Staff will find the above proposal responsive to its request. We remain available to discuss this issue further, should you desire.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President