

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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November 19, 1985

Docket No. 50-423  
B11881

Director of Nuclear Reactor Regulation  
Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

- References:
- (1) J. F. Opeka letter to B. J. Youngblood, "Application for Scheduling Exemption from GDC2," dated October 15, 1985.
  - (2) J. F. Opeka letter to B. J. Youngblood, "Seismic Interaction Program," dated August 8, 1985.
  - (3) B. J. Youngblood letter to J. F. Opeka, "Request for Additional Information," dated September 17, 1985.
  - (4) J. F. Opeka letter to B. J. Youngblood, "Seismic Interaction Program," dated September 27, 1985.
  - (5) J. F. Opeka letter to B. J. Youngblood, "Seismic Interaction Program," dated October 15, 1985.
  - (6) J. F. Opeka letter to B. J. Youngblood "Seismic Interaction Program," dated October 31, 1985.

Dear Mr. Youngblood:

Millstone Nuclear Power Station, Unit No. 3  
Application for Scheduling Exemption from GDC2

In Reference (1), Northeast Nuclear Energy Company (NNECO) requested pursuant to 10CFR 50.12 a scheduling exemption from 10CFR 50, Appendix A General Design Criteria (GDC) 2 as it relates to seismic interaction. The scheduling exemption requested would be for the period until the date of issuance of the full power operating license for Millstone Unit No. 3.

The exemption requested is necessary in order to allow fuel load and operation at power levels up to 5%, pending completion of a limited seismic interaction analysis. NNECO has made good faith efforts to provide the Staff with sufficient information on this issue, but the completed analysis will be unavailable in time to support fuel load. Under these special circumstances, a scheduling exemption in order to avoid an unnecessary delay in startup is in the public interest.

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To recap NNECO's efforts in this matter, in Reference (2) NNECO provided the Staff information regarding the seismic interaction program for Millstone Unit No. 3. Subsequently in Reference (3), the Staff requested additional information regarding the utilization of historical earthquake data in the evaluation of non-seismic Category I piping systems. In a telephone conversation concerning Reference (3) the Staff specifically requested that NNECO demonstrate quantitatively that the database of historical earthquake information is directly applicable to the Millstone Unit No. 3 seismic interaction program.

In Reference (4), NNECO further defined the seismic interaction program for Millstone Unit No. 3 and therein committed to provide additional information supporting the use of the historical database.

Representatives from NNECO met with the Staff on October 9, 1985 to discuss the Staff's concerns regarding the seismic interaction program submittals (References (2) and (4)).

Reference (5) provided the following information to address concerns raised in the October 9, 1985 meeting:

- o The applicability of the historical database to Millstone Unit No. 3
- o A proposed program to be implemented by NNECO to demonstrate that the load demand on piping and equipment anchorage does not exceed the anchorage capacity.

On October 24, 1985, representatives from NNECO met again with the Staff to discuss information contained in Reference (5). The Staff requested NNECO to provide clarification regarding the discussion of equipment anchorage included in Reference (5) and to describe the Sargent and Lundy program for piping and support analysis in detail.

Reference (6) included:

- o A summary of the three important aspects of the seismic interaction program and their interrelationships.
- o Piping samples selected for analysis and the basis for selection.
- o Acceptance criteria for the analysis of the bounding piping samples.
- o Criteria for equipment and piping anchorage evaluations.

According to NNECO's understanding, the only issue in the seismic interaction analysis that remains open is completion of the program outlined in Reference 6.

In order to support low power operation activities, NNECO requests a limited exemption from the seismic interaction requirements of GDC 2 for the duration of low power operation. Issuance of this requested limited exemption would consequently allow us to proceed with fuel load and low power startup testing

until the supplemental analysis committed to by NNECO in Reference (6) is submitted, reviewed and accepted by the Staff. As such, this request for an exemption is submitted strictly from a schedular standpoint to allow further staff review of our seismic interaction program analysis. No significant hardware modifications are anticipated to be necessary as a result of the analysis.

During this period, the likelihood of a seismic event approaching the level of the safe shutdown earthquake is very low. It is also clear that issuance of this limited exemption would not represent an undue risk to public health and safety. The schedular exemption would only be applicable to plant operation at power levels  $\leq 5\%$ . At these power levels, the accumulated fission product inventory will be minimal and the potential consequences to the public from any seismic interaction will be correspondingly low. Moreover, it is anticipated that the analyses are confirmatory in nature.

In summary, the exemption requested will not present an undue risk to public health and safety. A balance of the equities, such as the fuel load schedule, NNECO's good faith effort to comply, and the limited safety significance of the issue, demonstrates special circumstances justifying the exemption.

Also, pursuant to 10CFR 50.12, the exemption requested has no impact upon and will not endanger the common defense or security of the United States. NNECO respectfully requests that the schedular exemption be expeditiously granted.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY  
et. al.

BY NORTHEAST NUCLEAR ENERGY COMPANY  
Their Agent

J. F. Opeka  
J. F. Opeka  
Senior Vice President

C. F. Sears  
By: C. F. Sears  
Vice President

STATE OF CONNECTICUT   )  
                                  ) ss. Berlin  
COUNTY OF HARTFORD   )

Then personally appeared before me C. F. Sears, who being duly sworn, did state that he is Vice President of Northeast Nuclear Energy Company, an Applicant herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Jennifer Flowers  
Notary Public  
My Commission Expires March 31, 1989