

# NORTHEAST UTILITIES



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

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

November 21, 1985

Docket Nos. 50-336

A04826

F0762A

Director of Nuclear Reactor Regulation  
Attn: Mr. Edward J. Butcher, Chief  
Operating Reactors Branch #3  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Millstone Nuclear Power Station Unit No. 2  
Generic Letter 83-28, Item 4.5.3

In a letter dated April 17, 1985<sup>(1)</sup>, the Staff requested supplementary information on the Millstone Unit No. 2 response to Generic Letter 83-28, Item 4.5.3. In fulfillment of this request the following information is provided.

In response to Generic Letter 83-28, Item 4.5.3, the C-E Owners Group commissioned an evaluation of the recommended reactor trip system test intervals for C-E plants. The findings of this evaluation are contained in a report published in December 1984 (CE NPSD-277) "Reactor Protection System Test Interval Evaluation." The findings of the study concluded that the current Reactor Trip System (RTS) test intervals are consistent with maintaining the high degree of availability expected of the RTS.

NNECO has reviewed the C-E Owners Group report for applicability to Millstone Unit No. 2. The results of our review are summarized below:

- o The Reactor Protection System (RPS) models utilized in the evaluation are applicable to Millstone Unit No. 2.
- o The data employed in the analysis were updated to reflect the operating experience of C-E plants using appropriate statistical methods.
- o The treatment of common cause failures, the input parameters, and analysis assumptions are reasonable.
- o The results imply that (within the bounds of the analysis) RPS design median unavailability to trip the reactor on demand is less than the value used by the NRC.
- o The final conclusion of the study that the current RPS test intervals are consistent with maintaining a high degree of reliability is correct.

(1) J. R. Miller letter to W. G. Council, dated April 17, 1985.

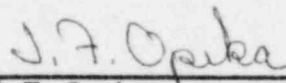
A055  
1/0

Based on the above, NNECO endorses the C-E Owners Group Report on RPS test intervals as our resolution of Generic Letter 83-28, Item 4.5.3 for Millstone Unit No. 2.

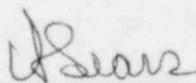
We believe that this information completely addresses your concerns on this matter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka  
Senior Vice President



By: C. F. Sears  
Vice President