

**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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P.O. BOX 270  
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(203) 665-5000

March 24, 1988

Docket No. 50-245  
B12809

Re: Integrated Safety  
Assessment Program

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1  
Integrated Implementation Schedule  
License Amendment

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby requests an amendment to Facility Operating License DPR-21 for Millstone Unit No. 1. The proposed amendment would add a license condition requiring NNECO to implement and maintain its Integrated Implementation Schedule (IIS) Program Plan (the Program Plan). The Program Plan provides a methodology to be followed for scheduling plant modifications and engineering evaluations. This license amendment application involves no significant hazards consideration.

DISCUSSION

In a letter dated August 4, 1987,<sup>(1)</sup> NNECO submitted its initial IIS for Millstone Unit No. 1. This initial IIS was a direct result of NNECO's Integrated Safety Assessment Program (ISAP) described in a letter dated July 31, 1986.<sup>(2)</sup> The initial IIS included completion dates for all currently planned plant modifications, plant-improvement projects, and engineering evaluations of well-defined scope. These activities generally address the Millstone Unit No. 1 ISAP topics and were scheduled based in part on their relative ISAP rankings.

NNECO now plans to formalize its methodology for developing and updating the Millstone Unit No. 1 IIS. As discussed in the August 4, 1987 letter, NNECO is hereby proposing a license condition to be added to the Millstone Unit No. 1

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- (1) E.J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Integrated Safety Assessment Program," dated August 4, 1987.
  - (2) J.C. Opeka letter to C.I. Grimes, "Integrated Safety Assessment Program - Final Report for Millstone Unit No. 1," dated July 31, 1986.

operating license, requiring that the IIS be developed and maintained consistent with an NRC-approved IIS Program Plan. The proposed license condition is provided in Attachment I.

NNECO's approach is different in concept from "integrated living schedules" at some other nuclear power plants. Under NNECO's approach, the Program Plan is being submitted for NRC review and approval. However, the specific implementation schedules for each topic will not be fixed by license amendment. NNECO believes that its approach is less cumbersome than alternate approaches, allowing the licensee sufficient flexibility in scheduling projects and in updating the schedule as necessary. The Program Plan in turn provides a consistent methodology and provides for NRC oversight in order to assure the integrity of the IIS process. The Program Plan is provided in Attachment II.

Essentially, under the Program Plan, ISAP serves as NNECO's prioritization methodology for developing the IIS. However, the Program Plan inherently recognizes that the ISAP methodology is evolving and will be refined for future revisions of the IIS. Further, in addition to the ISAP rankings, other considerations such as resource availability, outage duration, and ALARA goals must be factored into the IIS development process on a principled basis. The Program Plan provides the framework for this analysis.

The Program Plan also specifically provides for NRC oversight of the IIS. The Program Plan describes the responsibilities of NNECO with respect to submitting the IIS to the NRC; describes the mechanisms for updating the IIS and reporting to the NRC; and describes the mechanism for changing the Program Plan itself.

The IIS will incorporate: 1) activities mandated by NRC rules, orders, and license conditions; 2) regulatory items identified by the NRC, resulting in plant modifications, procedure revisions, or changes in staffing requirements; 3) prospective NRC requirements, or tasks mandated by other agencies; and 4) licensee-identified changes for operational improvement. The IIS may also incorporate other ongoing NNECO projects that require significant resource commitments.

Generally, under the Program Plan, if an implementation date for an activity is fixed by NRC regulation or order, NNECO will meet that date or seek an appropriate exemption to support a later date in the IIS. Otherwise, all implementation dates will be set by the ISAP/IIS methodology described in the Program Plan. Provisions in the Program Plan address changes to the schedule to accommodate newly identified activities, unforeseen circumstances, or new NRC requirements.

In summary, NNECO believes this scheduling process provides a coherent and consistent basis for enhancing nuclear power plant safety and operation. As has been the case with ISAP, the IIS process is by necessity an interactive one between NNECO and the NRC Staff.

### SIGNIFICANT HAZARDS CONSIDERATION

The proposed license amendment to add the IIS license condition to the Millstone Unit No. 1 operating license involves no significant hazards consideration. The proposed license amendment adds a license condition to the Millstone Unit No. 1 operating license to require implementation of the IIS Program Plan. The purpose of the Program Plan is to describe NNECO's methodology to develop a plant-specific plant improvement schedule for Millstone Unit No. 1 based in part on the prioritization methodology of ISAP.

The IIS resulting from the process described in the Program Plan, and required by the proposed license condition, will be NNECO's controlling schedule for implementing all modifications and engineering evaluations of a well-defined scope for Millstone Unit No. 1. This includes activities identified to address NRC regulatory issues as well as activities identified by NNECO to enhance safe, reliable, and economic operation of the plant. The IIS process described in the Program Plan is intended to assure that in scheduling implementation of these projects and studies, available (and finite) resources are devoted to the extent practicable in a prioritized and cost-effective manner.

The Program Plan specifically describes the ISAP prioritization methodology, the mechanism for addressing other "real-world" scheduling constraints, the mechanism for updating the IIS to reflect new issues and new circumstances, NNECO's periodic reporting requirements, NRC oversight, and the mechanism for updating the Program Plan itself.

Although the proposed license amendment will not incorporate specific implementation dates for each topic, NNECO's IIS Program Plan will assure a consistent and principled scheduling process with appropriate NRC oversight. In summary, through ISAP and the IIS, NNECO intends to optimize allocation of resources available for enhancing nuclear power plant safety and operation.

In 10CFR50.92(c), the NRC has provided standards for determining whether a significant hazards consideration is involved in a license amendment application. By applying these standards, NNECO concludes that this amendment involves no significant hazards considerations.

1. Operation of the facility in accordance with this proposed change will not involve a significant increase in the probability or consequences of any accident previously evaluated.

The proposed change would require the implementation of the IIS methodology described in the Program Plan. As such, it requires that NNECO establish an administrative means for tracking, prioritizing, and scheduling NRC-required plant modifications and engineering evaluations, and licensee-identified plant improvement projects. This methodology is intended to enhance plant safety by more effectively controlling the number and scheduling of plant modifications, thereby assuring that

issues required for safe operation of the plant receive priority and are completed in a timely manner.

Because the license condition addresses only an administrative scheduling mechanism, it does not affect directly the design or operation of the plant. Therefore, no accident analyses are affected and the proposed change does not increase the probability or consequences of any previously evaluated accident.

2. Operation of the facility in accordance with this proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

As discussed above, the proposed license condition establishes a new requirement relating to scheduling of modifications and engineering evaluations. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Operation of the facility in accordance with this proposed change will not involve a significant reduction in any margin of safety.

As discussed above, the proposed license condition establishes a new administrative requirement intended to enhance public safety and reliable plant operation. It does not affect any accident analysis or involve any modification to the plant configuration or operation. Therefore, the proposed change does not involve a reduction in any margin of safety.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986). The proposed amendment most closely resembles example (ii), a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications (e.g., a more stringent surveillance requirement), in that the proposed license amendment would require the implementation of the IIS Program Plan (not currently required) for the scheduling of plant modifications and well-defined engineering evaluations.

In accordance with 10CFR50.91(b)(1), a copy of this amendment request is being forwarded to the State of Connecticut.

Although this license amendment is not required for continued plant operation, NNECO recognizes the benefits of this program and therefore requests that the Staff act on this application in a timely manner.

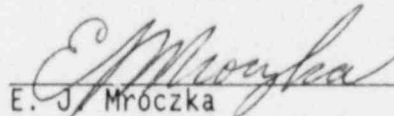


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Pursuant to the requirements of 10CFR170.12(c), enclosed with this license amendment request is the application fee for \$150.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
E. J. Mroczka

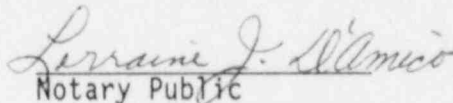
Senior Vice President

cc: W. T. Russell, Region I Administrator  
M. L. Boyle, NRC Project Manager, Millstone Unit No. 1  
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

Mr. Kevin McCarthy  
Director, Radiation Control Unit  
Department of Environmental Protection  
Hartford, Connecticut 06116

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

Then personally appeared before me, E. J. Mroczka, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

  
Notary Public

My Commission Expires March 31, 1988

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Attachment I  
Millstone Nuclear Power Station, Unit No. 1  
Proposed License Condition

March 1988

IIS License Condition

2.C(5) Integrated Implementation Schedule

- a. Northeast Nuclear Energy Company shall implement and maintain in effect the Integrated Implementation Schedule Program Plan (the Program Plan) to be followed for scheduling of plant modifications and engineering evaluations. The Program Plan shall be followed from and after the effective date of this license condition.
- b. This license condition shall be effective until (date of approval of amendment by NRC plus three years), subject to renewal upon application by the licensee.