

November 11, 1981

Docket No. 50-213
and 50-336
LS05-81-11-020

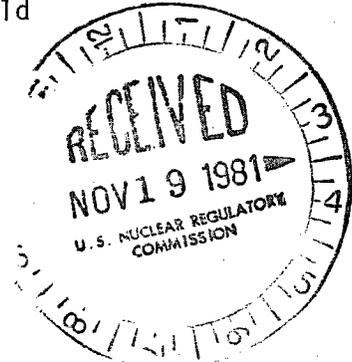
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Mr. W. G. Council
Connecticut Yankee Atomic Power Company
Northeast Nuclear Energy Company
Post Office Box 270
Hartford, Connecticut 06101

Dear Mr. Council:

SUBJECT: FIRE PROTECTION EXEMPTION - HADDAM NECK PLANT
AND MILLSTONE STATION, UNIT 2



The Commission has issued the enclosed Exemption from certain requirements of Section 50.48 and Appendix R to 10 CFR Part 50, in response to your letter dated March 19, 1981. This exemption, which is being forwarded to the Office of the Federal Register for publication, pertains to the requirement that the oil collection system for the reactor coolant pumps be designed, engineered, and installed so that there is reasonable assurance that the system will withstand the Safe Shutdown Earthquake.

Your request for exemption from the provisions of 10 CFR 50.48(c)(5) regarding the submittal of your plans and schedules for complying with 10 CFR 50, Appendix R, Items III.G and III.L is under review and will be the subject of separate correspondence.

Sincerely,

Original Signed by
H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
Exemption

cc w/enclosure:
See next page

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PDR

ORB#5:DL
HSmith
6/21/81

ORB#3:DL
MConner
6/22/81

Bill Shields
Must no OELD
concurrence needed
if no follow format
of Robinson

JW
10/5

OFFICE	ORB#5:DL	ORB#5:DL	C/ORB#3:DL	C/ORB#1:DL	AD:SA:DL	D:DL	D:NRP
URNAME	WPaulson:dn	TWambach	RAClark	DCrutchfield	GLainas	DEisenhut	HRDenton
DATE	6/21/81	6/22/81	6/23/81	6/23/81	6/23/81	6/21/81	10/10/81

November 11, 1981

cc w/enclosure:
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Neck Plant and Millstone Station Unit 2 are not inerted during normal operation, under this provision an oil collection system is required. Section III.0 of Appendix R specifies that the oil collection system shall be so designed, engineered, and installed that failure will not lead to fire during normal or design basis accidents and that there is reasonable assurance that the system will withstand the Safe Shutdown Earthquake (SSE).

By letter dated March 19, 1981, Connecticut Yankee and the licensees indicated that the installed oil collection system does not meet the SSE requirements and further asserted that a seismically qualified oil collection system would not enhance fire protection safety at the Haddam Neck Plant and Millstone Station Unit 2 because alternative means to fulfill the stated objective of the Commission had previously been implemented. Accordingly, Connecticut Yankee and the licensees requested an exemption from the requirements of Section III.0 of Appendix R to 10 CFR Part 50.

The exemption request is based on the following:

1. The lubrication oil systems for the reactor coolant pumps are qualified to remain functional during and after seismic events up to and including an SSE, and
2. The installed oil collection system would not cause loss of operability of safety related equipment nor would it cause a fire in the event of an SSE.

Because the lubrication oil systems for the reactor coolant pumps are qualified to remain functional during and after an SSE, oil leaks should not be expected as a result of such an event. Further, because the installed oil collection system itself is designed so that the dropping of components during an SSE should not cause loss of operability of safety related equipment nor cause a fire, the systems for each plant would not degrade safety features within containment.

Based on our evaluation, we conclude that the licensees' currently installed oil collection system at both Haddam Neck and Millstone 2 meets the objectives of Section III.0, "Oil Collection System for Reactor Coolant Pump," of Appendix R to 10 CFR Part 50. Therefore, the request to be exempted from the requirement that the oil collection system be so designed, engineered, and installed that there is reasonable assurance that the system for both plants will withstand the Safe Shutdown Earthquake should be granted.

III.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, an exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest. Therefore, the Commission hereby approves the exemption request identified above.

The NRC staff has determined that the granting of this exemption will not result in any significant environmental impact and that pursuant

to 10 CFR 51.5(d)(4), an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with this action.

FOR THE NUCLEAR REGULATORY COMMISSION



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 11th day of November, 1981.