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WMY 79-84
PC- 71-1

September 13, 1979

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation

Reference: a) License No. DPR-36 (Dock No. 50-309)
b) USNRC Letter to MYAPC dated July 23, 1979

Dear Sir:

Pursuant to the request for a license admendment delineated in Reference b) and Section 50.59 of the Commission's Rules and Regulations, the Maine Yankee Atomic Power Company hereby requests the authorization to make the following changes:

PROPOSED CHANGE: Reference is made to Maine Yankee Operating License No. DPR-36. We propose to modify this document as follows:

Add Section 2.b.(6)(e) Secondary Water Chemistry Monitoring

The licensee shall maintain a secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall include:

1. Identification of a sampling schedule for the critical parameters and limits for these parameters;
2. Identification of the procedures used to quantify parameters that have critical limits;
3. Identification of process sampling points;
4. Procedures for the recording and management of data;
5. Procedures defining corrective actions for off limit chemistry conditions; and
6. A procedure identifying the authority responsible for the interpretation of the data, and the sequence and timing of administrative events required to initiate corrective action.

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REASON FOR CHANGE: This proposed change will incorporate into the Maine Yankee Operating License, and License Condition requested in Reference b).

BASIS: The above described proposed change would provide assurance that the licensee would devote proper attention to controlling secondary water chemistry, while also providing the needed flexibility to more effectively deal with any off-normal conditions that might arise.

SAFETY CONDITIONS: This proposed change does not present any hazard considerations not described or implied in the license application as amended.

This proposed change has been reviewed by the Nuclear Safety Audit and Review Committee.

FEE DETERMINATION: Reference (b) requests that a Class III fee be submitted with this amendment application. MYAPC takes exception to that request for the following reasons.

It is Maine Yankee's position that this submittal clearly falls into that category of amendment described under footnote 2 of 10 CFR 170.22 which states:

"Class I, II or III amendments which result from a written Commission request for the application may be exempt from fees when the amendment is to simplify or clarify license or technical specifications; the amendment has only minor safety significance and is issued for the convenience of the Commission."

Maine Yankee feels that the fee exemption should apply for two reasons:

1. The license conditions, when incorporated into the Maine Yankee's operating license, will do nothing more than define requirements for a secondary water chemistry monitoring program similar to the program which has been in effect at Maine Yankee since it first went to operation in late 1972. It is precisely for this reason that we feel that the amendment when issued will be strictly for license clarification purposes, and for the convenience of the Commission only, as the addition of words describing program requirements will neither add or detract from the program currently being implemented.
2. In addition to the above, Maine Yankee feels that any fee charged for an amendment review should be commensurate with the manpower allocation which was necessary to perform that review, and as in this case no technical review was or will be necessary, then no fee should be imposed. For the above reasons, no fee is submitted with this license amendment request.

SCHEDULE OF CHANGE: The Maine Yankee Operating License will be amended immediately upon Commission approval.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY

W. P. Johnson
W. P. Johnson
Vice President

COMMONWEALTH OF MASSACHUSETTS)

)ss.

COUNTY OF WORCESTER)

Then personally appeared before me, W. P. Johnson, who, being duly sworn, did state that he is a Vice President of Maine Yankee Atomic Power Company, that he is duly authorized to file, execute and sign the foregoing request in the name and on the behalf of Maine Yankee Atomic Power Company, and that the statements therein are true to the best of his knowledge and belief.



Robert H. Groce

Robert H. Groce Notary Public
My Commission Expires September 14, 1984

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