



ATOMIC POWER COMPANY •
ENGINEERING OFFICE

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WMY 79-129

November 19, 1979

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Office of Nuclear Reactor Regulation
Mr. Harold Denton, Director

References: (a) License No. DPR-36 (Docket No. 50-309)
(b) USNRC Letter to YAEC dated October 30, 1979
(c) YAEC Letter to USNRC dated October 18, 1979
(d) USNRC Letter to YAEC dated September 13, 1979

Dear Sir:

Subject: Followup Actions Resulting from the NRC Staff Review Regarding
The Three Mile Island Unit 2 Accident

This letter is in response to your letter, Reference (b).

Our initial response with regard to our followup actions, Reference (c), was based on your letter of September 13, 1979, Reference (d), and our perception of the clarifications provided at the regional and topical meetings that we attended. Several deficiencies have been identified in our response to Reference (d). These items have been addressed in a revision to the attachment to Reference (c) and forwarded herewith (see attachment 1). We have not assessed any expansion to the scope of requirements which may be implied by Enclosure 1 of Reference (b) and reiterate that our current schedule is based on our understanding of your letter of September 13, 1979.

Due to Maine Yankee's operating schedule which includes a refueling outage beginning January 15, 1980, many plant hardware modifications have been focused to coincide with the plant shutdown. Due to the regional power considerations and the time of year (see attachment 2), a shutdown prior to that date would impose an unnecessary burden on the local consumers.

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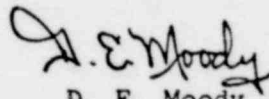
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Our schedule for completing each of the followup requirements is firm. In the event of a delay in any of our implementation commitments, we will inform you of the degree of completion by January 1, 1980, including a detailed justification for the delay.

We trust this information is satisfactory; however, if you have any further questions, please contact us.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY



D. E. Moody
Manager of Operations

DEM/fb

Enclosure

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ATTACHMENT

IMPLEMENTATION OF REQUIREMENTS FOR FOLLOWUP ACTIONS

<u>Sect. No.</u>	<u>Abbreviated Title</u>	<u>Requirement</u>	<u>Implementation Commitment</u>
2.1.1	Emergency Power Supply	Complete implementation.	<p>Redundant capability to supply pressurizer heaters from an offsite or emergency power source presently exists. Additional procedure development or modifications to existing procedures relative to heater operation, if necessary, will be accomplished by January 1, 1980.</p> <p>The M.O.V. Block valves on the pressurizer relief lines are presently supplied by an emergency power source.</p> <p>The Pressurizer solenoid operated relief valve will be connected to an emergency power source during the refueling shutdown which will commence on or about January 15, 1980.</p> <p>Pressurizer level instrumentation is presently supplied by an emergency power source.</p>
2.1.2	Relief and Safety Valve Testing	Submit program description and schedule.	<p>It is presently anticipated that a program description and schedule for Relief and Safety Valve testing will be available for submittal on or before January 1, 1980. This schedule for submittal assumes that the EPRI test program currently under development will be found acceptable, and is available.</p>

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<u>Sect. No.</u>	<u>Abbreviated Title</u>	<u>Requirement</u>	<u>Implementation Commitment</u>
		Complete test program.	The schedule for completion of the test program depends upon the progress of the EPRI program.
2.1.3.a	Direct Indication of Valve Position	Complete implementation.	Maine Yankee is presently scheduled to shutdown for refueling on or about January 15, 1980 for an estimated 5 week period. It is our intention to complete the installation of an acoustic accelerometer system during that period.
2.1.3.b	Instrumentation for Inadequate Core Cooling	Develop procedures describe existing inst.	As described in Maine Yankee's response to I&E Bulletin 79-06B, operating procedures have been reviewed and revised as necessary to: <ul style="list-style-type: none"> a. make the operators aware of the possibility of forming voids in the primary coolant system large enough to compromise core cooling capability, especially during natural circulation.

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2.1.3.b		New level instrument design submitted.	<p>b. provide appropriate operator action to prevent the formation of such voids, and</p> <p>c. specify additional operator action necessary to enhance core cooling in the event such voids are formed.</p> <p>Coupled with the above procedural modifications which have already been accomplished, Maine Yankee will provide a description of its existing instrumentation by January 1, 1980.</p> <p>Methods for the detection of reduced coolant level are presently being investigated by the Owners Groups and Yankee intends to submit a level instrument design by January 1, 1980, provided a satisfactory resolution is developed by this generic approach.</p>

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		Subcooling instrument installed.	Maine Yankee is presently evaluating proposals on subcooling instruments and related equipment. Assuming that the equipment selected is available for delivery, Maine Yankee intends to perform the installation during the refueling shutdown which will commence on January 15, 1980.
		New level instrument installed.	Maine Yankee intends to install a suitable device for detection of reduced coolant level, or adapt existing instruments to accomplish this purpose by January 1, 1981 depending upon the resolution of the new generic approach.
2.1.4	Diverse Containment Isolation	Complete implementation.	An Engineering effort is currently in progress to provide an Engineering design change which will make automatic, those interim manual actions as described in Maine Yankee's response to I&E Bulletin 79-06B relative to containment isolation actions. Maine Yankee will provide evaluation by January 1, 1980. It is Maine Yankee's intent to complete these changes during the refueling outage starting January 15, 1980.

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<u>Sect. No.</u>	<u>Abbreviated Title</u>	<u>Requirement</u>	<u>Implementation Commitment</u>
2.1.5.a	Dedicated H ₂ Control Penetrations	Description and implementation schedule.	Maine Yankee will meet schedule.
		Complete installation.	Maine Yankee will meet schedule.
2.1.5.c		Review procedures and bases for recombiner use.	Maine Yankee does not have recombiners. Additionally, per Ref. (b) of cover letter, no action is required at this time.
2.1.6.a	Systems Integrity for High Radioactivity	Immediate leak reduction program.	Maine Yankee will implement a leak reduction program by January 1, 1980.
		Preventive maintenance program.	Maine Yankee will establish a preventative maintenance program by January 1, 1980.
2.1.6.b	Plant Shielding Review	Complete the design review.	Maine Yankee will perform a preliminary review of radiation and shielding design by January 1, 1980.
		Implement plant modifications.	Modifications to plant systems will be dependent upon the results of the design review. The schedule for completion of the modifications will then be consistent with any associated constraints imposed by labor and material availability, with the objective of completion of the modifications by the January 1, 1981 date.

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<u>Sect. No.</u>	<u>Abbreviated Title</u>	<u>Requirement</u>	<u>Implementation Commitment</u>
2.1.7.a	Auto Initiation of Auxiliary Feed	Complete implementation of control grade.	It is Maine Yankee's intention to implement this requirement during the January 15, 1980 refueling shutdown provided that the safety analysis gives assurance that no degradation of safety will occur.
		Complete implementation of safety grade.	It is Maine Yankee's intention to upgrade to safety grade equipment at the first scheduled cold shutdown following receipt of equipment.
2.1.7.b	Auxiliary Feed Flow Indication	Complete implementation.	Maine Yankee intends to complete the installation of Auxiliary Feed Flow Instruments during the outage starting January 15, 1980.
			It is Maine Yankee's intention to upgrade to safety grade equipment at the first scheduled cold shutdown following receipt of equipment.

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<u>Sect. No.</u>	<u>Abbreviated Title</u>	<u>Requirement</u>	<u>Implementation Commitment</u>
2.1.8.a	Post Accident Sampling	Design review complete.	Maine Yankee will complete a review of its capability to obtain the necessary samples by January 1, 1980.
		Preparation of revised procedures.	If the review to be completed in Item 2.1.8.a-(1) indicates that the capability exists to obtain the desired samples, procedures will then be revised to implement that capability by January 1, 1980.
		Implement plant modifications.	If it is determined through the review the sampling capability does not exist, plant modifications will be engineered which will give that capability, in accordance with the January 1, 1981 requested date for completion.
		Description of proposed modification.	Maine Yankee will submit a description of the proposed modifications by January 1, 1980.

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2.1.8.b	High Range Radiation Monitors	Installation complete.	<p>Maine Yankee will install noble gas effluent monitors and high range radiation level monitors by January 1, 1981, subject to instrument qualification and availability.</p> <p>Procedures for estimating releases by the use of installed equipment will be available for review by the emergency plan review team.</p>
2.1.8.c	Improved Iodine Instrumentation	Complete implementation.	<p>Maine Yankee presently has the capability to determine airborne iodine concentration. Procedures presently in effect require the use of charcoal for iodine sampling and the use of the plants GeLi detector for gamma ray energy spectrum analysis which can discriminate iodine from noble gasses.</p>
2.1.9	Transient and Accident Analysis	Complete analysis procedures, and training in areas of: small break LOCA, inadequate core cooling, accidents and transients.	<p>To accomplish this action item, Maine Yankee will utilize generic work produced by the NSSS vendor in accordance with commitments made between the Combustion Engineering Owner's Group and the Commission. Implementation of emergency procedures and initiation of training programs will be accomplished expeditiously, consistent with the intent of Reference (b) of the cover letter. In addition, within one year of completion of the generic analytical work Maine Yankee will validate independently the applicability of the generic guidelines and analyses for the Maine</p>

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	Containment Pressure Monitor	Installation complete.	Maine Yankee will install a containment pressure monitor of adequate range by January 1, 1981.
	Containment Water Level Monitor	Installation complete.	Maine Yankee will install a containment water level monitor by January 1, 1981.
	Containment Hydrogen Monitor	Installation complete.	Maine Yankee will install a hydrogen monitor by January 1, 1981.
	RCS Venting	Design submitted.	This area is being investigated by the Combustion Engineering owners group at this time. Maine Yankee intends to follow the recommendations made by the owners group. A venting system design will be submitted by January 1, 1980 provided that this schedule is found to be consistent with the resolution of Owners Group recommendations.
		Installation Completed.	The venting system will be installed at the first scheduled outage opportunity after the design is complete and the associated equipment is available.
2.2.1.a	Shift Supervisor Responsibilities	Complete implementation.	Actions required relative to Shift Supervisors responsibilities will be implemented by January 1, 1980.

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2.2.1.b	Shift Technical Advisor	Shift technical advisor on duty.	Shift Technical Advisor requirements will be implemented at Maine Yankee by January 1, 1980.
		Complete training.	Procedures and training requirements will be completed by January 1, 1981.
2.2.1.c	Shift Turnover	Complete implementation.	Maine Yankee will review and revise plant procedures for shift turnover as necessary by January 1, 1980.
2.2.2.a	Control Room Access Control	Complete implementation.	Maine Yankee will establish the necessary controls to limit access to the control room by January 1, 1980.
2.2.2.b	Onsite Technical Support Center	Establish center.	An onsite Technical Support Center will be established at Maine Yankee by January 1, 1980. Description of the permanent center will be submitted by January 1, 1980.
2.2.2.c	Onsite Operational Support Center	Complete implementation.	An onsite Operational Support Center will be established at Maine Yankee by January 1, 1980.

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