



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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July 16, 1980

Docket No. 50-213
B10037

Director of Nuclear Reactor Regulation
Attn: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Haddam Neck Plant
Proposed Revisions to Environmental Technical Specifications

Connecticut Yankee Atomic Power Company (CYAPCO) hereby proposes to amend its operating license number DPR-61 for the Haddam Neck Plant pursuant to the provisions of 10CFR50.90 and Section 5.6.3 of Appendix B to DPR-61.

Attachment 1 is a proposed change to Section 2.4.3.1(1) of the Environmental Technical Specifications (ETS) which modifies the gaseous release rate limit from instantaneous to one averaged over a one-hour period.

It is CYAPCO's position that the current instantaneous release rate does not provide sufficient flexibility of operation. Such flexibility should allow unusual conditions which may temporarily result in releases higher than the design objective level but which are still within the limits specified by 10CFR Part 20. The quarterly and yearly average release rate specifications along with the reporting requirements of ETS 2.4.3.3 are more limiting than ETS 2.4.3.1(1) and continue to provide reasonable assurance that the resulting annual gamma and beta airborne doses due to noble gases will not exceed 10 mrad and 20 mrad, respectively.

Recent events at the Haddam Neck Plant have highlighted the overly restrictive nature of the current instantaneous release rate limit. Three reportable releases exceeded this specification by up to 180%. Yet, in each case, the offsite whole-body dose was considerably less than 0.005 mrem for the entire release. The proposed ETS 2.4.3.1(1) will preclude reporting of trivial occurrences due to system transients. The averaging over a one-hour period is consistent with other operating plant Technical Specifications and with 10CFR Part 20.106(a). This change is within the cost/benefit criteria of existing station design.

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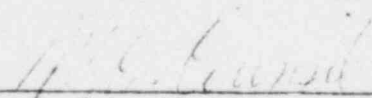
CYAPCO has reviewed the proposed change in accordance with 10CFR50 Appendix I, 10CFR20, and 40CFR190 and determined that it does not constitute an unreviewed environmental impact, and there is no adverse effect on public health and safety. The Connecticut Yankee Environmental Review Board has reviewed and approved the proposed change and concurred in the above determinations.

In reviewing the proposed change pursuant to 10CFR170, CYAPCO has determined that this amendment is a Class III amendment. Accordingly, a check for \$4,000 (four thousand dollars) is enclosed.

CYAPCO respectfully requests that this proposed change receive expedited review in light of the upcoming end of the 1980 refueling outage.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



W. G. Council
Senior Vice President

Enclosure

