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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

July 7, 1980

Docket No. 50-213

Mr. W. G. Counsil, Vice President Nuclear Engineering and Operations Connecticat Yankee Atomic Power Company Post Office Box 270 Hartford, Connecticut 06101

Dear Mr. Counsil:

You are requested to provide the information specified in the enclosure to this letter regarding the testing of the reactor trip system and engineered safety features for the Haddam Neck Plant. Receipt of your response is requested not later than December 1, 1980.

Sincerely,

Dennis M. Crutchfield, Chief Operating Reactors Branch #5 Division of Licensing

Enclosure: Request for Additional Information

cc w/enclosure: See next page

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Mr. W. G. Counsil

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cc w/enclosure: Day, Berry & Howard Counselors at Law One Constitution Plaza Hartford, Connecticut 06103

Superintendent Haddam Neck Plant RFD #1 Post Office Box 127E East Hampton, Connecticut 06424

Mr. James R. Himmelwright Northeast Utilities Service Company P. O. Box 270 Hartford, Connecticut 06101

Russell Library 119 Broad Street Middletown, Connecticut 06457

Board of Selectmen Town Hall Haddam, Connecticut 06103

Connecticut Energy Agency ATTN: Assistant Director Research and Policy Development Department of Planning and Energy Policy 20 Grand Street Hartford, Connecticut 06106

Director, Technical Assessment Division Office of Radiation Programs (AW-459) U. S. Environmental Protection Agency

Crystal Mall #2 Arlington, Virginia 20460 U. S. Environmental Protection Agency Region I Office ATTN: EIS COORDINATOR JFK Federal Building Boston, Massachusetts 02203 PEQUEST FOR INFORMATION ON SEP TOPIC VI-10.A "TESTING OF REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES INCLUDING RESPONSE TIME TESTING"

As part of our review of this topic we need to determine the extent to which you may be employing jumpers and jury rigs to perform periodic tests of Class IE electrical systems (or the equivalent of such systems in your plant). Such practices would be contrary to current licensing criteria. Specifically, the use of jury-rigged bypasses such as temporary jumpers, the removal of fuses, or removal of connections are not permitted by Regulatory Guide 1.118. The basis for this provision is that such practices are not conducive to satisfying the requirements of IEEE Std. 279-1971 Section 4.11 and usually are a violation of Section 4.13. In addition, the means which are provided for the testing of protection systems should satisfy the requirements of IEEE Std. 279-1971 Section 4.11 and 4.13.

IEEE Std. 279 Section 4.11 requires that the system be designed to permit testing, calibration and maintenance during power operation without compromise of the capability to perform the safety function in the event of a single failure. (An exemption is granted for one-out-of-two systems where it can be shown that the probability of failure in the remaining channel is acceptably small). The methods that have been found acceptable to the staff is satisfying the requirements of Section 4.13 (Indication of Bypasses) are presented in Regulatory Guide 1.47.

Because sufficient information as to the extent to which you may use such bypasses has not been found in the docket file, please describe:

- (1) The extent to which you use jury-rigged bypasses, and
- (2) The means that are used to satisfy the basis objectives of current licensing criteria so that during testing:
 - (a) The protection system meets the single failure criterion, and
 - (b) The operator has clear and accurate indication of system status (including assurance of knowing that a subsystem is in test and that, when the test is completed, the bypasses have been removed). Where administrative procedures are relied upon, please describe them in sufficient detail to allow a comparison with the intent of Regulatory Guide 1.47.