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YANKEE ATOMIC ELECTRIC COMPANY

B.4.1.1

WYR 80-37



20 Turnpike Road Westborough, Massachusetts 01581

March 24, 1980

United States Nuclear Regulatory Commission Office of Inspection and Enforcement Region I 631 Park Avenue King of Prussia, PA 19406

Attention: Mr. Boyce H. Grier, Director

References: (a) License No. DPR-3 (Docket No. 50-29)

(b) USNRC Letter to YAEC dated February 6, 1980;

I&E Bulletin No. 80-03

Dear Sir:

Subject: Response to I&E Bulletin No. 80-03

The following information is being provided in response to Reference (b), I&E Bulletin No. 80-03, "Loss of Charcoal from Standard Type II, 2 inch, Tray Adsorber Cells".

As requested in paragraph I of IE Bulletin No. 80-03, charcoal adsorber cell integrity was evaluated at Yankee Rowe. The systems evaluated were the following:

- 1. Post Accident Hydrogen Control System
- 2. Ventilation Exhaust Filter Systems F10 and F11

The Post Accident Hydrogen Control Filter System is a non-standard design consisting of 1" piping that carries air flow through a cylindrical HEPA filter (8" housing) and one MSA Type II (Part # ASK-1743-1552) adsorber. The housing for the adsorber consists of reinforced sheet metal. Do to the system configuration, detailed visual inspection is impractical without disassembly. The same adsorber cell (MSA Part # ASK-1743-1552) is used extensively at Maine Yankee. Visual inspection of several systems using the MSA cell at Maine Yankee revealed no indications of loose charcoal or sagging screens. The rivet spacing in the MSA tray is 3-5/8".

The Post Accident Hydrogen Control Filter System at Yankee Rowe is not an ESF system nor has its removal efficiency been assumed in determining compliance with design criteria of 10CFR50, Appendix I. Further, the outflow of the hydrogen control filter system is routed via the steam jet air ejector line through the ventilation exhaust filter system (described below) before finally exhausting to the atmosphere via the primary vent stack.

U.S. Nuclear Regulatory Commission March 24, 1980 Attention: Mr. Boyce H. Grier, Director Page 2 In consideration of the above statements, we feel that disassembly of the hydrogen control filter system for the purpose of visual inspection is not warranted. The ventilation Exhaust Filter Systems at Yankee Rowe contain deep bod charcoal adsorber sections which consist of a one inch section of nonimpregnated ("guard bed") charcoal followed by a four inch section of impregnated charcoal. Selected units were visually inspected to answer the concerns of IE Bulletin No. 80-03. The screens used in the adsorber section are steel sheets with 1/16" holes covering about 40 percent of the surface area. The screens are spot welded to the structural members with a weld every 1.5 inches. There was no separation of screens from structural members or failed spot welds. There was no visible charcoal or charcoal fines in the inlet channels, outlet channels, on the floor of the chamber between the charcoal beds outlets and the HEPA filters, or on the upstream surfaces of the HEPA filters. There were no visible deformities in any filter housing structural members. We trust that this information is satisfactory; nowever, should you require any additional information please contact us. Very truly yours, YANKEE ATOMIC ELECTRIC COMPANY D. E. Moody Manager of Operations BLD/sec