



CONNECTICUT YANKEE ATOMIC POWER COMPANY

BERLIN, CONNECTICUT

P. O. BOX 270 HARTFORD, CONNECTICUT 06101

TELEPHONE  
203-666-6911

May 23, 1980

Docket No. 50-213  
A01009

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

Reference: (1) D. M. Crutchfield letter to W. G. Council dated May 7, 1980.

Gentlemen:

Haddam Neck Plant  
Short-Term Lessons-Learned Implementation

In Reference (1), the NRC Staff forwarded its evaluation of the implementation of Category A lessons-learned requirements at the Haddam Neck Plant. Based on its evaluation, the Staff concluded that implementation of the Category A requirements was acceptable except for one open item, that being Item 2.1.4, Containment Isolation. The Staff requested Connecticut Yankee Atomic Power Company's (CYAPCO) response regarding its intention to implement the Staff requirements and resolve the open item prior to restart from the current refueling outage. Accordingly, the following information is provided.

As stated in Reference (1), the open item concerns the group of systems that affect reactor coolant pump operation in a post-accident situation. Before CYAPCO provides its detailed response, it is appropriate to review the history of this issue in an effort to achieve some reasonable perspective.

The Staff's TMI-related requirements on the subject of containment isolation were first documented in NUREG-0578. Of the four specific criteria, only one, that involving reset logic, has been the subject of considerable debate. The evolution of this issue as it applies to the Haddam Neck Plant involves the following considerations:

- (1) The existing configuration is in full compliance with the NUREG-0578 requirements.
- (2) The existing configuration is in full compliance with the September 13, 1979 D. G. Eisenhut letter regarding NUREG-0578 implementation.

8005300364

- (3) The existing configuration is in full compliance with the October 30, 1979 H. R. Denton clarification letter.
- (4) The existing configuration is in full compliance with the Staff's verbal criteria provided in telephone discussions in December, 1979.
- (5) The general issue of containment isolation was the subject of NRC's Show Cause Order dated January 2, 1980.
- (6) CYAPCO's plans regarding disposition of the order were fully explained in the December 13, 1979 and January 17, 1980 letters from W. G. Council to H. R. Denton.
- (7) The NRC approved CYAPCO's response and approach to the Show Cause Order by letter dated February 1, 1980.

Subsequent to the above-noted developments, the Staff verbally informed CYAPCO during the Lessons-Learned implementation audit of additional undocumented criteria which resulted in the Staff's determination that the existing configuration is unacceptable. The Staff position summarized in Reference (1) appears to conflict with the Staff directives forwarded in I&E Bulletin No. 79-06C, regarding reactor coolant pump operation. In addition, the May 7, 1980 letter from D. G. Eisenhut to All Operating Reactor Licensees delays implementation of an automatic reactor coolant pump trip scheme pending further investigation regarding optimization of such a scheme. The above-described communication techniques are straining CYAPCO's ability to respond to regulatory concerns in a timely fashion. These considerations summarize the basis for CYAPCO's repeated requests for documented acceptance criteria.

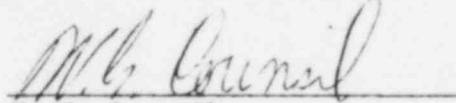
Nonetheless, CYAPCO proposes to resolve the NRC concern as follows. Prior to startup from the current refueling outage, the containment isolation valves associated with the reactor coolant pump auxiliaries will be removed from the high-containment pressure and safety injection system actuation circuits. The systems associated with reactor coolant pump operation, those being component cooling water to the thermal barrier, the reactor coolant pump oil coolers, and the seal water return valves, will be reclassified as essential systems. As such, it will no longer be appropriate to automatically isolate them in the event of a high-containment pressure or a safety injection signal. It is CYAPCO's understanding that the above measures will constitute an acceptable resolution to the Staff's concern.

CYAPCO further notes that I&E Bulletin No. 80-06 requires yet another review of these same systems regarding reset logic. The absence of acceptance criteria in the subject Bulletin suggests that the Staff's evaluation may continue to change. It is our sincere hope that the Staff review associated with this Bulletin will take into consideration the above-summarized evaluations.

We trust you find the above-noted commitment a satisfactory resolution of the Reference (1) request.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

A handwritten signature in cursive script, appearing to read "W. G. Council", is written over a horizontal line.

W. G. Council  
Vice President