



ATOMIC POWER COMPANY
ENGINEERING OFFICE

WMY 80-87
B.3.2.1

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June 4, 1980

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Office of Nuclear Reactor Regulation
Division of Licensing
Mr. Robert A. Clark, Chief
Operating Reactors Branch #3

References: (a) License No. DPR-36 (Docket No. 50-309)
(b) NUREG-0578
(c) USNRC Letter to All Operating Nuclear Power Plants, dated
October 30, 1979

Subject: NUREG-0578 Hydrogen Monitoring

Dear Sir:

The following is a description of the proposed hydrogen monitoring system for the Maine Yankee Plant.

The primary analyzer will be a Comsip-Delphi Model K-III Thermal Conductivity Analyzer. This analyzer, scheduled for delivery late in 1980, is being type qualified by the manufacturer to IEEE Standard 323-1974 and IEEE Standard 344-1975. The K-III is a remote controlled analyzer which will monitor hydrogen concentration in two ranges, 0-10% and 0-20% by volume. Controls for the analyzer as well as an indicator and a strip chart recorder will be mounted in the main control room.

The second analyzer was purchased in 1971 from the Bendix Corporation and has been in use without problems for several years. This unit is a dual range analyzer, measuring hydrogen concentration by thermal conductivity. Since the high range (0-20%) eclipses the NUREG requirement of 0-10%, we feel that the Bendix analyzer more than meets this requirement. Further, since the unit has been seismically qualified and is located in an area not subject to high energy line breaks, jet impingement or other severe conditions and the environmental conditions (including accident) are within the manufacturer's specified ambient conditions; this unit is qualified to operate under all conditions for which it is required.

The Bendix analyzer presently provides local indication only; however, when the Comsip analyzer and related equipment are installed, an indicator from the Bendix analyzer will be installed in the main control room.

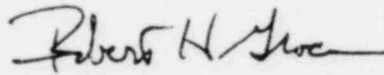
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The cost of replacing the Bendix analyzer has been conservatively estimated at over one hundred thousand dollars. It is the opinion of Maine Yankee Atomic Power Company (MYAPC) that the imposition of this somewhat significant cost to the consumers of New England, for a relatively insignificant improvement in quality, is not justified considering the quality and capability of the proposed system. Therefore, MYAPC requests that you evaluate the acceptability of the proposed system to satisfy the requirements of the referenced documents.

Should you have any questions, please contact us.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY



Robert H. Groce
Senior Engineer - Licensing

RGJ/ncj