CONNECTICUT VANKEE ATOMIC POWER COMPANY

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Docket No. 50-213 A00980

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

References: (1) D. C. Switzer letter to A. Schwencer dated January 13, 1978.

(2) D. L. Ziemann letter to W. G. Counsil dated April 23, 1980.

Gentlemen:

Haddam Neck Plant Boron Dilution Incidents

Reference (1) was the response to a request from the NRC Staff for Connecticut Yankee Atomic Power Company's (CYAPCO) reevaluation of all Boron Dilution Incidents at the Haddam Neck Plant. In that letter, we stated ". . . it has been reconfirmed that all inputs of unborated water (including chemical) from any system into the Reactor Coolant System (RCS), enter the RCS via the Primary Water System. Since the Primary Water System has a capacity of 130 gpm, this would constitute the maximum possible flow of unborated water into the RCS. It has also been concluded that even using the more conservative assumptions, there is sufficient time available (with'n the criterion of at least 10 to 15 minutes) for operators to recognize and to terminate the dilution flow before the reactor would go critical."

Reference (2) requested that CYAPCO confirm that <u>all</u> possible dilution paths were considered in our evaluation and that the operators have at least 15 minutes to recognize and terminate dilution flow before inadvertent criticality occurs.

Therefore, CYAPCO is again reconfirming that <u>all</u> possible dilution paths have been considered and evaluated and we find that the worst case (i.e., the shortest time for operator response) will allow the operators slightly more than 30 minutes (31.5 minutes) to recognize and terminate the dilution flow before the reactor would go critical.

We trust this adequately addresses the Staff's concerns.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

W. G. Counsil Vice President