



ATOMIC POWER COMPANY •  
ENGINEERING OFFICE

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B.3.2.1  
WMY 80-92

June 9, 1980

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation  
Division of Licensing  
Darrell G. Eisenhut, Director

Reference: (a) License No. DPR-36 (Docket No. 50-309)  
(b) USNRC Letter to All Operating Reactor Licensees, dated  
May 7, 1980  
(c) USNRC Letter to All Operating Reactor Licensees, dated  
March 28, 1980

Subject: Five Additional TMI-2 Related Requirements

Dear Sir:

Your letter, Reference (b), transmitted five items from the NRC TMI Action Plan which, applicable to operating reactors, constitute a second set of requirements for operating reactors. Maine Yankee was requested to reply within 30 days stating our commitments to meet the additional requirements and associated schedules.

The attachment to this letter provides a tabulation by item of the eleven requirements specified in Reference (b) and our specific plan to address each. Maine Yankee recognizes our obligation to respond to NRC requests for information and it is our intention to be fully responsive in this regard. However, we trust that the NRC staff recognizes that Maine Yankee, as the licensee, bears the full weight of responsibility for the safe operation of our facility. In the fulfillment of our responsibilities, we are obligated to perform independent, plant specific assessments of any additional requirements prior to implementation, to assure that the collective impact of NRC requirements will not compromise existing system safety and reliability. This overall assessment of the collective impact of the requirements was recommended by the Bulletins and Orders Task Force in Item B.15 of NUREG 0626.

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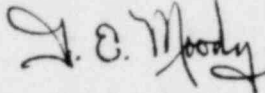
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Please note that Maine Yankee will respond to Item (1), Shift Manning, within 30 days of receipt of the material to be provided by your staff through separate correspondence. Furthermore, discussions with your staff negated the need for any action/commitment by Maine Yankee regarding items II.K.3.25, II.K.3.29, and II.K.3.44.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY



D. E. Moody  
Manager of Operations

RHG/sec

Attachment

Implementation Schedule and Summary

<u>Item No.</u>	<u>Title</u>	<u>Requirement</u>	<u>Implementation</u>
I.A.1.3	Shift Manning		Maine Yankee will respond to the scope and schedule of this requirement within 30 days of receipt of the detailed information.
I.A.3.1	Revise Scope and Criteria for Licensing Examination	Submit revised programs.	Reference (c) provided revised criteria to be applied to all Reactor Operator, Senior Reactor Operator and Requalification Training activities. Maine Yankee's training programs were modified in conformance with that revised criteria and were implemented prior to May 1, 1980 as requested. Revised programs will be submitted to OLB for review by August 1, 1980.
I.C.5	Licensee Dissemination of Operating Experience to Plant Staff	Perform an operating experience assessment to assure that important information is continually provided to operators.	Maine Yankee commits to review and revise applicable procedures as necessary to assure that operating information pertinent to plant safety originating both within and outside the organization, is continually supplied to operator and other personnel, and is incorporated into plant training and retraining programs in accordance with the guidance provided in Enclosure (2) to Reference (b). Maine Yankee intends to complete the procedure review and revision by January 1, 1981.
II.K.3.1	Isolation and Testing of Automatic PORV Isolation System	(1) Licensee to document proposed changes for staff approval prior to implementation. Documentation to be submitted by scheduled date. (2) Licensee to implement modifications and perform conformatory test at the next refueling outage following staff approval of the design unless this outage is scheduled within six months of the approval date. In this event, modifications will be completed during the following refueling outage.	If the results of the PORV failure studies, required under item II.K.3.2 below, indicate that a system to automatically isolate the PORV's is necessary, Maine Yankee will commit to the design and installation of such a system not later than six months after completion of the study discussed in Item II.K.3.2.

Implementation Schedule and Summary

<u>Item No.</u>	<u>Title</u>	<u>Requirement</u>	<u>Implementation</u>
II.K.3.2	Vendor Report on PORV Failure Reduction	Provide report to staff.	Maine Yankee intends to participate in the vendor review of the PORV failure rates study. Any schedule for reporting of the results of the vendor efforts are currently beyond the authority of Maine Yanke to commit. The results of this review will be used to determine the necessity for action requested in Item II.K.3.1 above.
II.K.3.3	Reporting Safety and Relief Valve Failures and Challenges	Provide an annual report on SRV and RV failures and challenges as of Jan. 1, 1981.	Maine Yankee currently reports all failures of safety valves as Reportable Occurrences, and will commit to include any relief valve failures in future LER reports. Maine Yankee does not consider an additional annual report of challenges to these valves necessary, since these challenges will most probably occur in conjunction with a failure of some other component, and this information would be included with the LER report on the failed component.
II.K.3.5	Automatic Trip of RCP During a LOCA	Provide the results of an evaluation of alternative solutions to RCP trips.	Maine Yankee will commit to provide the results of a study of alternatives to RCP trip by January 1, 1981. In the meantime, Maine Yankee will keep in place procedural requirements to manually trip the RCP, derived from NRC SB-LOCA procedure guidelines.
II.K.3.17	Report on Outage of ECCS During the Last Five Years	Provide a report detailing outage dates, and lengths of outages for all ECCS for the last five years of operation.	Maine Yankee intends to submit a report on the outage of ECC System by January 1, 1981.
II.K.3.30	Revised SB-LOCA Methods to Show Compliance with 10 CFR 50, Appendix K	Submit analysis model for staff approval.	Maine Yankee intends to revise SB-LOCA Methods to show compliance with 10 CFR 50, Appendix K by July 1, 1983.
II.K.3.31	Plant Specific Calculations to Show Compliance with 10 CFR 50.46	Submit the results of an evaluation to the staff.	Maine Yankee intends to demonstrate compliance with 50.46 within one year after NRC approval of SB-LOCA Methods, revised in accordance with Item II.K.3.30.

Implementation Schedule and Summary

<u>Item No.</u>	<u>Title</u>	<u>Requirement</u>	<u>Implementation</u>
III.D.3.4	Control Room Habitability	Assure that control room operators will be adequately protected against the effects of accidental release of toxic and radioactive gases.	Maine Yankee commits to perform a Control Room Habitability study in conformance with the guidance provided in Enclosure 4 to Reference (b). The results of the study including a description of any modifications deemed necessary and projected schedule for their completion shall be submitted to NRC staff review on or before January 1, 1981. Maine Yankee anticipates that any modifications, should they be necessary, will be completed by January 1, 1983.