## MORTHEAST UTSLIT



P.O. 80X 270 HARTFORD, CONNECTICUT 06101 (203) 666-6911

August 27, 1980

Docket No. 50-213

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. M. Crutchfield letter to W. G. Counsil dated July 28, 1980.
  - (2) D. L. Ziemann letter to W. G. Counsil dated January 1, 1980.
  - (3) W. G. Counsil letter to D. L. Ziemann dated February 14, 1980.
  - (4) W. G. Counsil letter to D. L. Ziemann dated March 14, 1980.
  - (5) W. G. Counsil letter to D. M. Crutchfield dated June 30, 1980.
  - (6) W. G. Counsil letter to D. M. Crutchfield dated August 5, 1980.

## Gentlemen:

Haddam Neck Plant Millstone Nuclear Power Station, Unit No. 1 SEP - Anchorage and Support of Safety Related Electrical Equipment

In Reference (1), the NRC Staff provided clarifying information regarding the scope and schedule of staff requirements on the subject of anchorage and support of safety related electrical equipment. The original staff requirements were documented in Reference (2), subsequent correspondence from Connecticut Yankee Atomic Power Company and Northeast Nuclear Energy Company was docketed in References (3), (4), and (5).

Item (5) of Attachment (1) to Reference (1) requests a separate action plan for the resolution of the issue of the seismic design of cable trays. Accordingly, the following information is provided.

CYAPCO and NNECO are participants in a group of SEP licensees who have initiated a multi-phase program developed to assure the seismic design adequacy of the Category 1E cable trays and raceway systems. This group has contracted with URS/Blume and Associates, Engineers, to conduct the

first phase of this effort. This initial step involves site visits by Blume to establish the major categories of raceways and to develop a generic approach to accomplish the objective. Subsequent to completion of this phase, it is anticipated that a qualification program, likely to involve full-scale testing, will be undertaken. Conceptional designs are corrently being developed to confirm the feasibility of this approach. Although it is difficult to provide a firm schedule at this time, it is envisioned that this portion of the seismic re-evaluation program will be completed on a timetable consistent with the schedular provisions of Reference (6), i.e. any modifications will be completed prior to or during the early 1983 refueling outage.

The staff requests of Reference (1) raise one item of very serious concern to CYAPCO and NNECO, that of seismic support for internally attached components. In any given piece of electrical equipment, there may be tens or a hundred individual components to be evaluated by the anchorage criteria. Accomplishment of this task is a practical impossibility. The appropriate method of addressing this concern is to seismically qualify the entire piece of equipment. Consistent of the provisions of Reference (6), it is planned to evaluate electrical equipment systematically, after the buildings had been evaluated and floor response spectra generated. The staff has previously inferred that this approach is acceptable as noted in SECY-80-325, and as discussed by CYAPCO in Reference (6).

In summary, please be advised that CYAPCO and NNECO are not planning to specifically address the issue of internally attached components in the response to be submitted by December 31, 1980.

We remain available to respond to further staff requests or attend meetings as required to satisfactorily disposition the Reference (1) concerns.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

F. Caurisil

W. G. Counsil

Senior Vice President

U F For

Executive Vice President