CONNECTICUT YANKEE ATOMIC POWER COMPANY BERLIN, CONNECTICUT P. O. BOX 270 HARTFORD, CONNECTICUT 06101 August 27, 1980 203-666-6911 Docket No. 50-213 A00705 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) W. G. Counsil letter to D. G. Eisenhut dated April 11, 1980. (2) H. R. Denton letter to All Operating Nuclear Power Plants dated October 30, 1979. (3) R. Reid letter to W. G. Counsil dated December 21, 1979. (4) W. G. Counsil letter to D. L. Ziemann dated January 30, 1980.
(5) D. G. Eisenhut letter to All Pressurized Water Reactor Licensees dated July 2, 1980. (6) D. G. Eisenhut letter to W. G. Counsil dated March 27, 1980. (7) D. G. Eisenhut letter to All Operating Power Reactor Licensees dated August 7, 1980. Gentlemen: Haddam Neck Plant Automatic Initiation of Auxiliary Feedwater In Reference (1), Connecticut Yankee Atomic Power Company (CYAPCO) summarized, as of that date, the implementation status of Automatic Initiation of Auxiliary Feedwater for the Haddam Neck Plant. Reference (1) also indicated that CYAPCO would be addressing in a future submittal: The final safety-grade design; The proposed revisions to Technical Specifications; and The acceptability of the installations from a safety perspective. 3. CYAPCO's interim request for withdrawal of this requirement for the Haddam Neck Plant was reiterated in Reference (1) but has not received a favorable Staff decision. Therefore, CYAPCO is docketing this letter to address the above topics. The requirements of Reference (2) were revised by the Staff in Reference (3), in that implementation of automatically initiated auxiliary feedwater was prohibited until the NRC Staff completes its review and issues an approval. Although Reference (6) indicated that the Staff's evaluation would be available by June 1, 1980, CYAPCO has not received the subject evaluation as of this writing. 8009030641

Pursuant to the requirements of 10CFR50.59, CYAPCO has installed a control-grade automatic Auxiliary Feedwater System, which is currently defeated pending NRC review. At such a time as the NRC Staff issues an affirmative safety evaluation, the system will be put into service.

Reference (1) committed CYAPCO to address the acceptability of the installation from a safety perspective. Analyses were performed to examine the effects of automatic initiation on return-to-power and containment response. The results of these analyses were submitted via Reference (4). On the basis of Reference (4) and subsequent verificatory analyses, CYAPCO has determined that the control-grade scheme for automatic initiation of auxiliary feedwater is acceptable from a safety perspective.

In Reference (3), as supplemented by Reference (5), the Staff provided model Technical Specifications for an automatic initiation scheme. These specifications have been modified to apply to the Haddam Neck Plant. Therefore, pursuant to 10CFR50.90, CYAPCO proposes to amend its operating license, DPR-61, by incorporating the revisions identified in Attachment 1 into the Haddam Neck Technical Specifications. It is our position, concurrent with Reference (3), that formal docketed approval of this installation is required prior to implementation. Despite the fact that this installation constitutes an unreviewed safety question, CYAPCO concludes from Reference (4) and subsequent analyses that the installation is acceptable from a safety perspective. The installation has not been deemed necessary to ensure continued safety operation, but is acceptable.

The Haddam Neck Plant Nuclear Review Board has reviewed and approved the attached proposed changes and concurred in the above determinations.

Via Reference (5), the NRC Staff has determined that this amendment is in the public interest and is exempt from free as per 10CFR170.11. In Reference (7), the Staff reversed its decision and advised that 10CFR170 fees are applicable. Therefore, CYAPCO has reviewed the attached proposed changes, in conjunction with other changes contemplated by review of Reference (5), and has determined that, in the aggregate, the changes constitute a Class IV amendment. Accordingly, enclosed is payment in the amount of \$12,300 (twelve thousand, three hundred dollars). The basis for this determination is that the changes involve multiple safety issues of the Class III type.

It is anticipated that future submittals will reference this letter and the accompanying payment regarding 10CFR170.

In summary, the control-grade scheme for automatic initiation of auxiliary feedwater is installed and will be made operable after NRC review and approval. Of the three commitments noted in Reference (1), only the commitment to provide the final safety-grade design for the automatic initiation scheme remains outstanding and this topic will be the subject of future correspondence.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

W. G. Counsi

Senior Vice President

Attachment

STATE OF CONNECTICUT ) august 27, 1980 ) ss. Berlin COUNTY OF HARTFORD

Then personally appeared before me W. G. Counsil, who being duly sworn, did state that he is Senior Vice President of Connecticut Yankee Atomic Power Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Motary Public My Commission Expires Maich 31, 1981