

YANKEE ATOMIC ELECTRIC COMPANY



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October 1, 1980

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

Attention: Office of Nuclear Reactor Regulation
Mr. Dennis M. Crutschfield, Chief
Operating Reactors Branch 5
Division of Licensing

- References:
- (a) License No. DPR-3 (Docket No. 50-29)
 - (b) Letter from Vincent Lettieri (BNL) to A'an Wang (USNRC) dated September 11, 1979
 - (c) Yankee Rowe Inservice Inspection Program, Revision 1

Dear Sir:

In regard to the items raised in Reference (b) and telephone conversations with Mr. R. Randall of our staff and your Mr. Alan Wang, the following items can be confirmed:

Section 1.1.1 The flow path for the HPSI test is a fixed resistance system, not variable as was incorrectly stated in Reference (c).

Section 2.1 The SI-V-2 can only be full stroke tested by placing full nitrogen pressure (473 + 10 psi) on the accumulator and forcing flow up the LPSI lines when the reactor head is removed during refueling. This, however, is damaging to trip valves SI-TV-604, 605, and 606, whose function is to trip open on a SI signal. These valves have plastic seats which are sometimes deformed during the operation of the valve, such that they will not seat tight upon reclosure. The function of these valves is to open, not close, so this characteristic has no safety consequences; however, the accumulatory pressurizing system has to be isolated to repair the valves. For this reason Yankee requests relief from full flow testing of SI-V-2.

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SI-V-2 can be part stroke tested at cold shutdown intervals by taking suction on the accumulator with a HPSI pump and pumping into the SI tank. This can only be done when main coolant pressure is below 300 psig and main coolant temperature is above 200°F per Tech. Spec. 3.5.3. This condition exists only for a short time during a normal cooldown. It should be recognized that a cooldown is a complex process and that it is possible that all the prerequisites for performing such a flow test may not be met each and every cold shutdown. However, Yankee will commit to attempting to perform this surveillance at cold shutdown, and will commit to performing this part stroke each refueling.

- 2.2.A Safety Injection System check valves SI-V-14 and CS-V-621 can be verified closed by observing differential pressure across the valve following a HPSI and LPSI pump surveillance, respectively. As this can be done quarterly, Yankee meets the Section XI requirements for these valves for closure.
- 2.2.B and C Check valves HC-1199 and SW-V-820, 821, 822, and 823 are Category A valves which are exempt from testing per the Tech. Specs. There currently is no way to test these valves. Yankee proposes that the valves be disassembled and inspected at refueling intervals.
- 2.2.G The Shutdown Cooling Valves SC-MOV-551, 552, 553, and 554 are not physically locked. They are operated by key lock switches, and the motor contactors are deenergized in Modes 1, 2, and 3. These valves are in the ISI Program only because they are containment isolation valves per Tech. Specs. The submittal is correct as is.
- 2.2.H SI-V-18, 19, 20, and 21 are Pressure Isolation Valves and should be listed as Type AC.
- 2.2.I SI-MOV-22, 23, 24, and 25 are Category E valves and there is no testing interval for these valves.
- 2.2.J SI-MOV-46 is not a locked valve; therefore, it is not a Category E valve. It is electrically disconnected during normal operation, but must be electrically enabled and closed post LOCA for Hot Leg Injection.
- 2.2.K SI-MOV-4 is normally open and electrically disconnected and has no safety function. It will be removed from the ISI Program.

- 2.2.L Valves VD-TV-211 and 212 should state closed for safety position, not three months.
- 2.2.M Valves HV-V-5 and HV-V-6 are locked closed containment isolation valves are correctly listed as AE.
- 2.2.N HCV-1199 is Category AC, not A as submitted.

Additional changes to ISI Program:

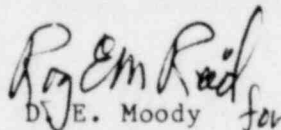
1. (Drawing M-2) PR-MOV-512 can be full stroke exercised quarterly. The submittal will change from refueling intervals to quarterly.
2. (Drawing M2) PR-SOV-90 can no longer be exercised at any time. As a result of Yankee's own Post TMI-2 review of our system, the discharge header for SOV-90 and the Pressurizer Code Safety Valves (which formerly ran to a quench tank, the Low Pressure Surge Tank, outside containment) was modified with a rupture disc, leaving it discharging directly into containment. This was done to alleviate the potential for a loss of coolant outside containment. Consequently, any operation of PR-SOV-90 will discharge contaminated steam into containment, an unacceptable consequence of a surveillance.

Since the Low Pressure Surge Tank (LPST) is no longer a quench tank for the Primary Safety Valves, it no longer has a safety function. Therefore, it can be removed from the ISI Program. It is exempted from examination by Exemption IWC-1220 a, "components in systems where both the design pressure and temperature are equal to or less than 275 psig and 200°F, respectively."

We trust this information is satisfactory; however, if you have any questions, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY


D. E. Moody for

Manager of Operations