YANKEE ATOMIC ELECTRIC COMPANY

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WMY 76-109

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October 26, 1976

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

Attention: Office of Nuclear Reactor Regulation

- Reference: (a) License No. DPR-3 (Docket No. 50-29)
 - (b) USNRC letter to YAEC dated 6/7/76
 - (c) YAEC letter WYR 76-74 dated 6/8/76
 - (d) MYAPCo letter WMY 76-110 dated 10/14/76
 - (e) NUREG-0081 dated 6/1/76

Dear Sir:

Yankee has reviewed the design of the reactor coolant system and reactor vessel supports for the Yankee Nuclear Power Station as a result of Reference (b).

As indicated in Reference (c), it is our position that the issue discussed in Reference (b) falls under the backfit criteria of 10CFR50.109, since the requested information exceeds that required by the design bases specified for the plant.

The reactor coolant system for the Yankee Nuclear Power Station was designed and constructed in accordance with the rules of ANSI B31.1, with greatly increased examination requirements. The examination requirements were consistent with present practice.

The Yankee plant reactor coolant system was designed in accordance with adequately conservative codes and standards, whose allowable stress values were lower than present codes. The plant operating conditions are considerably below design conditions, thus reducing the actual stresses and further increasing the margin between operating stresses and allowable limits.

Reference (d) submitted the results of a reactor coolant system failure probability study; the study showed that, assuming equivalent design parameters, an ANSI B31.1 designed piping system would require greater wall thickness than an ASME Section III designed system. The reason is that B31.1 allows the designer to not consider certain analyses by imposing lower allowable stresses to account for factors not considered. This principle is discussed in Reference (e).

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Based on these factors Yankee considers the results of Reference (d) to be applicable to Yankee Nuclear Power Station. Thus, we feel the probability of the event discussed in Reference (b) to be sufficiently low to warrant its being considered not credible and thus not warranting further study.

Based on this information and the above mentioned backfit consideration, Yankee concludes that the concerns of Reference (b) have been adequately addressed, and no further action is necessary.

We trust you will find this information satisfactory; however, if you desire additional information, please feel free to contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

Vice President

JRH/kg

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Yankee Atomic Electric Company - 3 -

July 22, 1977

cc w/out enclosure (Contd) Public Service Board State of Vermont 120 State Street Montpelier, Vermont 05602

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