

YANKEE ATOMIC ELECTRIC COMPANY

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FYR 81-19

February 4, 1981

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

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

References: (a) License No. DPR-3 (Docket No. 50-29)
(b) KMC Letter to USNRC for SEP Owners Group, dated
December 5, 1980
(c) USNRC Letter to SEP Licensees, dated January 14, 1981

Subject: Redirection of the Systematic Evaluation Program (SEP)

Dear Sir:

Reference (c) specifies certain commitments discussed in meetings among the SEP Owner with representatives of the NRC SEP staff. We concur that the majority of the commitments specified were agreed to at these meetings. Specifically, the SEP Owners Group program recognizes that:

- (1) 60% of the topic assessments are to be completed by the end of June, 1981;
- (2) not all topics can be completed by the end of June, 1981 because of long-lead characteristics or inadequate definition of applicable criteria; and
- (3) there be a lead plant concept to identify an SEP plant responsible to work with the staff reviewers and develop the initial draft topic assessment for each topic whose review has not begun.

It should be noted that this 60% level includes those topics for which resolution has already been effected such as: draft SER, topics considered complete, topics not applicable or deleted, and generic issues outside the SEP scope. In addition, there is the possibility that all topics may not be addressed under the program by the end of June, 1981; however, that does not preclude achieving the other staff goals within that time frame.

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In order for these goals to be realized by the staff and the SEP Owners Group, the staff's resources are expected to be concentrated toward prompt issuance of draft SER's and 30 day review response on licensee topic assessment submittals. Since the staff has employed consultants to perform certain evaluations, particularly electrical, and instrumentation and control, it would appear expedient for the consultants to develop draft SER's on each of their topics for each of the plants, rather than have them judge a licensee's topic assessment and then generate an SEP.

In response to the conditions specified in Reference (c), we provide the following:

As a result of a meeting held December 18, 1980 between the USNRC and the SEP Owner's group, Yankee Atomic Electric Company has been assigned "lead plant" for the following topics; II-4.D, II-4.F, III-3.A, III-8.C, IV-2, V-10.B, V-II.A, VI-7.C.3 and IX-5.

- (1) We intend to complete the topic assessment assigned to us, for staff review by June 30, 1981, such that a 60% aggregate total will have been submitted for review. Table 1 describes our current plans for completing SEP work through June of this year. This table provides a status of our current SEP efforts.
- (2) We intend to actively support the NRC staff review of the SEP topics in accordance with the 60% goal and June 30, 1981 date. It should be understood that we as a member of the SEP Owners Group will attempt to support the staff's lead topic assessments for each topic by June, 1981; however, some of the long-lead or criteria deficient topics may preclude that accomplishment.
- (3) Yankee Atomic as a member of the SEP Owners Group, agrees to the 90 day trial period.
- (4) We see no need to return to the "Lead Plant" concept at this time.
- (5) This condition is unique to Consumers Power Company. If the staff is considering expanding this condition to include other licensees, we would object strongly to assigning a local representative in Bethesda.
- (6) We agree that the SEP Owners Group should meet periodically (bi-monthly) with NRC SEP management to discuss SEP progress and program planning.
- (7) We intend to process draft SER's and advise the NRC SEP staff of findings within the 30 day response period when possible.

Yankee Atomic Electric Company and the SEP Owners Group appreciates the staff's adoption of the Owners Group plan to implement resolution of SEP topics preparatory to the development of the integrated assessment position for each of the SEP plants. It is anticipated that the conditional commitments specified above satisfies the staff requirements to attain topic resolution.

TABLE 1

<u>Lead Plant Topics</u>		<u>Schedule</u>
II-4.D	Stability of Slopes	June, 1981
II-4.F	Settlement of Foundations	June, 1981
III-3.A	Effects of High Water Level on Structures	June, 1981
III-8-C	Irradiation Damage-Sensitized S.S.	Complete
IV-2	Reactivity Control Systems (Incl. Single Failure)	June, 1981
V-10.B	RHR - Reliability	Complete
V-11.A	Requirements for Insul. Hi/Lo Pressure Systems	Complete
VI-7.C.3	PWR Loop Isol. Closure - ECCS Def.	June, 1981
IX-5	Ventilation Systems	April, 1981
<u>Other Topics</u>		
II-1.B	Population Distribution	April, 1981
II-1.C	Potential Hazards - Outside Site Boundary	April, 1981
II-3.A	Hydrologic Description	April, 1981
II-4	Geology - Seismology	April, 1981
II-4.A	Tectonic Province	April, 1981
II-4.B	Proximity Capable Faults	April, 1981
II-4.C	Historical Seismicity - 200 miles	April, 1981
V-11.B	RHR Interlock Requirements	June, 1981

Yankee Atomic Electric Company is concerned that SECY-81-13, as discussed during a commissioners' briefing on January 14, 1981 and made publicly available that same day, may preclude completion of the Systematic Evaluation Program as presently constituted. Specifically, SECY 81-13 singles out the SEP plants for an additional scope of work beyond that which is being agreed to in this letter. The agreed to redirection of the SEP in addition to removing a substantial work load from the NRC and placing it on the SEP plants, also calls for an accelerated schedule.

The additional task of SECY-81-13, as currently proposed, will impede the efforts for completion of the SEP by requiring yet another complete reevaluation against a new, yet to be issued, revised standard review plan. Any new requirements imposed on the Systematic Evaluation Program by the implementation of SECY-81-13 will result in a delay in the completion of the program. More importantly, it seriously puts in question the continuation of the SEP program as proposed since, if SECY 81-13 is implemented, it will require another reevaluation.

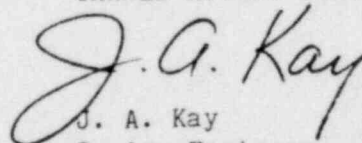
The 137 issues in the Systematic Evaluation Program are those issues deemed to have the greatest potential for safety significance. The SEP issues were chosen from a much larger list of issues deemed to be those issues having the greatest potential for safety significance. This approach conforms to section 110 of Public Law 96-295 that requires a review of particularly significant safety requirements. Therefore, the Systematic Evaluation Program, as it is currently proposed, fulfills the intent of the public law. In fact, the SEP plants are far ahead of other operating plants in meeting the intent of this law.

The Systematic Evaluation Program should be completed, as proposed by the SEP Owners group, unincumbered by new requirements imposed by SECY-81-13. If any new requirements are imposed upon SEP as a result of the implementation of SECY-81-13, the Systematic Evaluation Program should be halted and a reevaluation of the entire program, including schedule completion, should be preformed.

We trust that you find this information satisfactory. However, if you have any questions, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY


J. A. Kay

Senior Engineer - Licensing