



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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April 16, 1981

Docket No. 50-213
A01379



Director of Nuclear Reactor Regulation
Attn: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U. S. Nuclear Regulatory Commission
Washington, DC 20555

- References:
- (1) W. G. Council letter to D. G. Eisenhut, dated December 31, 1980.
 - (2) W. G. Council letter to D. M. Crutchfield, dated February 27, 1981.
 - (3) W. G. Council letter to D. G. Eisenhut, dated December 15, 1980.
 - (4) W. G. Council letter to D. M. Crutchfield, dated August 27, 1980.
 - (5) D. G. Eisenhut letter to All Pressurized Water Reactor Licensees, dated July 2, 1980.

Gentlemen:

Haddam Neck Plant
Proposed Revision to Technical Specifications
Automatic Initiation of Auxiliary Feedwater

In Reference (1), Connecticut Yankee Atomic Power Company (CYAPCO) advised the NRC Staff that proposed Technical Specifications for the safety-grade automatic auxiliary feedwater initiation system would be submitted by February 15, 1981. Subsequent to the docketing of Reference (1), CYAPCO determined that there were questions concerning the availability of the primary coolant loop isolation valves for the analysis of the steam generator tube rupture event.

Following further discussions with the NRC Staff, Reference (2) was docketed detailing CYAPCO's concerns and the conclusion that the case of no isolation of the affected steam generator by the loop stop valve had been addressed in previously docketed analyses and was, therefore, not reportable. Reference (2) also informed the Staff that the proposed Technical Specifications for the safety-grade auxiliary feedwater system would be submitted by April 15, 1981. Accordingly, CYAPCO hereby provides Attachment 1, in fulfillment of this commitment. Single change bars identify changes proposed in Reference (4) for the control-grade scheme. Double bars reflect changes for the safety-grade scheme.

A complete review of the steam generator tube rupture event and detailed dose analyses will be performed as part of SEP Topic XV-17.

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In References (1) and (3), CYAPCO requested that implementation of the safety-grade scheme be delayed until the 1981 refueling outage. Should installation of the safety-grade system be required by July 1, most of the work required to install the safety-grade system would be installed during plant operation. This is undesirable from the point of view of having personnel working on or near energized circuits. These circuits may be de-energized during shutdown. In addition, there is a greater probability of a spurious reactor trip or unexpected event while personnel are working on energized circuitry.

Because installation of the new transmitters cannot be performed during power operation in that access to the loop areas is necessary, implementation of the safety-grade scheme requires a plant outage.

Human engineering requirements require that space on the main control board now used for the control-grade scheme should be utilized for the safety-grade scheme. Therefore, a lapse in the availability of an automatic scheme for initiating auxiliary feedwater can be avoided by waiting until the refueling outage to install the safety-grade scheme.

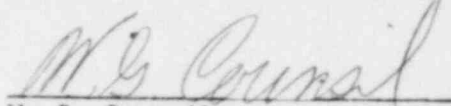
There is currently installed at the Haddam Neck Plant a control-grade scheme for automatic initiation of auxiliary feedwater. This scheme is currently defeated pending the Staff's safety evaluation. Should the control-grade scheme receive a favorable safety evaluation, it will be made operable. Either this scheme or the operator's ability to manually initiate auxiliary feedwater assures its availability as required. Thus, CYAPCO requests that this requirement be delayed until the next refueling outage, scheduled to begin in October, 1981. In the event this position is not acceptable, CYAPCO requests prompt notification. The absence of a favorable safety evaluation from the Staff on the control-grade scheme to date supports the position that mid-cycle implementation of the safety-grade scheme is not appropriate.

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. The proposal is consistent with the requirements of NUREG-0737, and reflects the system design which was fully described in Reference (1). Despite the fact that the installation of automatic initiation of auxiliary feedwater constitutes an unreviewed safety question as defined in 10CFR50.59, installation of the system is acceptable from a safety perspective. The Haddam Neck Plant Nuclear Review Board has reviewed and approved the attached proposed changes, and has concurred in the above determinations.

Via Reference (4), CYAPCO forwarded payment, pursuant to 10CFR170, for Technical Specification changes resulting from a review of Reference (5). The payment included in Reference (4) was for a Class IV amendment, and as such, applies to the attached proposed change. Accordingly, no additional payment is enclosed.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

A handwritten signature in cursive script, appearing to read "W. G. Council", is written over a horizontal line.

W. G. Council
Senior Vice President

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

April 16, 1981

Then personally appeared before me W. G. Council, 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.

Shirley M. Oates
Notary Public

My Commission Expires March 31, 1985