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April 30, 1981

Docket No. 50-213 A01584

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) D. M. Crutchfield letter to W. G. Counsil, dated March 10, 1981.

(2) W. G. Counsil letter to D. L. Ziemann, dated March 6, 1980.

Gentlemen:

Haddam Neck Plant
SEP Topic V-5; Reactor Coolant Pressure
Boundary Leakage Detection

In Reference (1) the Staff forwarded their evaluation of the subject SEP Topic, V-5. Connecticut Yankee Atomic Power Company (CYAPCO) was requested to review this evaluation for accuracy, and to identify any clanges necessary to reflect the as-built conditions at the Haddam Neck Plant. CYAPCO has reviewed the Staff's assessment and finds it to be substantially correct and accurate with one exception.

The Staff states in their evaluation that "the detection systems should be capable of performing their functions following seismic events and capable of being checked in the control room." Regulatory Guide 1.45 requires seismic qualification of only the airborne particulate radioactivity monitoring system, and not the leakage detection systems. Experience at Millstone Nuclear Power Station, Unit Nos. 1 and 2 has demonstrated a lack of significant correlation between primary RCPB leak rate and the indication from the airborne particulate monitor. CYAPCO has determined that, based on this prior experience, the requirement for seismic qualification of the monitor is not justified.

In Reference (2) CYAPCO justified its position with respect to qualification of the sump level monitoring system. CYAPCO stated that the narrow range sump level transmitter was not, and would not, be qualified to the requirements of Regulatory Guide 1.89. Due to the absence of a Staff reply to the contrary on Reference (2) which was docketed over one year ago, CYAPCO has concluded that this is an acceptable position to the NRC. The new wide range sump level monitor required by NUREG-0737 will be fully qualified and redundant, in accordance with the Staff position.

CYAPCO trusts this information will be included in the final evaluation of SEP Topic V-5.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

W. G. Counsil

Senior Vice President