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January 22, 1990

Docket	Nos.	50-213
	1.1	50-245
		50-336
		B13419

Re: USI A-46 GL 87-02 HNP ISAP Topic 1.48

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

Gentlemen:

Haddam Neck Plant Millstone Nuclear Power Station, Unit Nos. 1 and 2 <u>Resolution of Unresolved Safety Issue A-46</u>

In a letter dated September 30, 1988⁽¹⁾ Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) provided the NRC Staff with a status pf our efforts to resolve USI A-46. This was in response to the July 29, 1988⁽²⁾ NRC Staff Safety Evaluation Report (SER) on Revision O of the Generic Implementation Procedure (GIP) developed by the Seismic Qualification Utility Group (SQUG). The purpose of this letter is to provide an update to the Staff concerning our efforts to resolve this issue.

According to the generic schedule submitted by SQUG in its October 9, 1987 letter, ⁽³⁾ Revision 1 of the GIP was to be completed by the end of calendar year 1988, followed by NRC review in the first quarter of 1989. As scheduled, Revision 1 of the GIP was completed and submitted to the NRC Staff. However, as yet the NRC Staff has not issued their updated SER.

- E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Response to Generic SER on Resolution of Unresolved Safety Issue A-46," dated September 30, 1988.
- (2) L. C. Shao letter to N. P. Smith, "Generic Safety Evaluation Report on SQUG Generic Implementation Procedure," dated July 29, 1988.
- (3) N. P. Smith letter to Dr. T. E. Murley, "Seismic Qualification Utility Group Response to Generic Letter 87-02 - Resolution of USI A-46," dated October 9, 1987.

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Since the SER on Revision 1 of the GIP has not been issued by the NRC Staff, there has been a commensurate delay in our proposed schedule for implementation of the GIP at the Haddam Neck Plant and Millstone Unit Nos. 1 and 2. CYAPCO and NNECO will not be in a position to establish the full scope of our USI A-46 commitments until all licensing issues are resolved and a final SER is issued by the NRC Staff. Assuming no significant changes in the workscope currently envisioned for resolution, the plant walkdowns associated with this issue can be undertaken by the conclusion of the second refueling outage after the final SER is issued and open items resolved. ⁽⁴⁾ Identification of safe shutdown equipment and other tasks necessary to prepare for the walkdown will be accomplished prior to the associated outages. ⁽⁵⁾ If the final SER is issued during the first quarter of 1990 with no open items or significant change in scope, work could commence during the currently scheduled outages listed in the table below. If the schedule for NRC review slips further, the walkdown and other activities would be revised accordingly.

Second Refueling Outage After First Quarter of 1990:

Haddam Neck	June 1992
Millstone Unit No. 1	January 1993
Millstone Unit No. 2	July 1993

CYAPCO and NNECO will review the final GIP after approval by the NRC Staff and resolution of all outstanding issues. Based on this review, CYAPCO and NNECO will submit to the Staff plant-specific plans and schedules as to how we propose to resolve USI A-46 at Haddam Neck and Millstone Unit Nos. 1 and 2. These plans may incorporate, as appropriate, work done under previous projects (e.g., SEP), generic SQUG work and the efforts to resolve other generic safety issues. Any modifications identified during the walkdowns will be evaluated and scheduled for implementation via the Integrated Safety Assessment Program (ISAP) for all three plants.

- (4) This schedule is contingent upon a number of factors including: (1) those noted above, (2) scope and schedule for the conduct of SQUG training, and (3) the resource problem created by many licensees competing for use of limited industry expertise available to assist such efforts.
- (5) CYAPCO and NNECO intend to proceed with informal reviews on equipment anchorage issues and equipment interaction.
- (6) NNECO informed the NRC Staff of our plans to expand the ISAP Program to include Millstone Unit No. 2 in our July 27, 1989 and October 31, 1989 responses to Generic letter 88-20, "Individual Plan Examinations". Based upon the identified schedules for USI A-46 activities, we expect ISAP to be fully functional for Millstone Unit No. 2 by this time.

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Please contact us if you have any questions.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Mroczka Senior Vice President

cc: W. T. Russell, Region I Administrator

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W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3