



P.O. BOX 270 HARTFORD, CONNECTICUT 06141-0270 (203) 665-5000

October 19, 1990

Docket No. 50-213 B13579

Re: 10CFR50, Appendix J ISAP Topic 1.03

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

References:

- D. M. Crutchfield letter to E. J. Mroczka, "Exemption From Certain Requirements of 10CFR50, Appendix J," dated September 29, 1987.
- E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Haddam Neck Plant, 10CFR50, Appendix J, Request for Exemption," dated April 28, 1989.
- E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Haddam Neck Plant, 10CFR50, Appendix J, Request for Exemption," dated September 8, 1989.
- E. C. Wenzinger letter to E. J. Mroczka, "NRC Region I Inspection No. 50-213/90-12," dated August 28, 1990.

Gentlemen:

Haddam Neck Plant 10CFR50, Appendix J Exemptions

In a letter dated September 29, 1987 (Reference 1), the NRC Staff granted Connecticut Yankee Atomic Power Company (CYAPCO) a schedular exemption from the requirements of 10CFR50, Appendix J, Section III.C for certain containment penetrations at the Haddam Neck Plant. Subsequently, by letters dated April 28, 1989 (Reference 2), and September 8, 1989 (Reference 3), CYAPCO requested permanent exemptions from the Type C testing requirements of 10CFR50, Appendix J, Section III.C with respect to certain penetrations addressed in the Staff's September 29, 1987, letter. Since the submittal of these additional exemption requests, and after discussions with the NRC Staff, CYAPCO has reassessed the need for these exemptions and has determined that a number of the requested exemptions will no longer be necessary after the completion of certain planned modifications. Attachment 1 to this letter provides a brief summary of the requested exemptions and identifies which exemptions will no longer be required. By this letter, CYAPCO hereby withdraws the exemption requests indicated in Attachment 1 as being no longer necessary after the 1991 refueling outage.

9010260057 901019 PDR ADOCK 05000213 PDC U.S. Nuclear Regulatory Commission B13579/Page 2 October 19, 1990

CYAPCO wishes to point out that the schedular exemption granted by the NRC Staff for the Haddam Neck Plant will expire on start-up from the 1991 refueling outage, and that the modifications to the penetrations identified in Attachment 1 will be completed prior to start-up from this outage. Additionally, CYAPCO requests that the NRC Staff address the remaining exemption requests, also identified in Attachment 1, by January 2, 1991, in order to allow sufficient time for CYAPCO to address any Staff questions prior to the expiration of the schedular exemption and to provide sufficient lead time to order the parts needed.

We trust you will find this information satisfactory, and we remain available to answer any questions you may have.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

E. J. Mroczka Senior Vice President

cc: T. T. Martin, Region I Administrator

A. B. Wang, NRC Project Manager, Haddam Neck Plant

J. T. Shedlosky, Senior Resident Inspector, Haddam Neck Plant

Attachment 1

Haddam Neck Plant

Summary of Requested 10CFR50, Appendix J Exemptions

U.S. Nuclear Regulatory Commission B13579/Attachment 1/Page 1 October 19, 1990

Haddam Neck Plant Summary of Requested 10CFR50, Appendix J Exemptions

Summary of Requested Exemptions

A. Exemption Requests to be withdrawn:

From CYAPCO submittal dated April 28, 1989:

| Penetration Number | Description |
|------------------------|--|
| P11A | Drain Header Sample |
| P11B | Pressurizer Steam Sample |
| P11C | Pressurizer Liquid Sample |
| P11D | Loop 1 Hot Leg Sample |
| P24A through P24D | Safety Injection Recirculation |
| P29 (See Note 1 Below) | Component Cooling Water to Reactor Coolant Pump Oil Cooler |
| P34 | Component Cooling Water From Reactor Coolant Pump Thermal Barrier |
| P61 | Component Cooling Water From Neutron Shield Tank Cooler |
| P63 (See Note 2 Below) | Neutron Shield Tank Fill |
| P66 | Component Cooling Water to Drain Cooler |
| P67 | Component Cooling Water From Drain Cooler |
| | |

- Note 1: CYAPCO's April 28, 1989, submittal designated this penetration as P28. This was incorrect, the correct penetration designation is P29.
- Note 2: Modification to this penetration has already been made. This line is now capped.

U.S. Nuclear Regulatory Commission B13579/Attachment 1/Page 2 October 19, 1990

2.

P3

| Penetration Number | Description | |
|--------------------|----------------------------------|--|
| P68 | Primary Water to Containment | |
| P69 | Reactor Coolant System Loop Fill | |

- B. Appendix J Exemptions still requested:
 - 1. From CYAPCO submittal dated April 28, 1989:

| Penetration Number | Description |
|-----------------------------|----------------------------------|
| P4 | Pressurizer Relief Tank Vent |
| P8 | Reactor Coolant System Charging |
| P14 | Vapor Seal Head Tank |
| P33 | Refueling Cavity Purification |
| P62 | Service Air to Containment |
| P78 | Relief Tank Drain |
| P80 (See Note 3 Below) | Auxiliary Spray From Fire System |
| From CYAPCO submittal dated | September 8, 1989: |
| Penetration Number | Description |

High Pressure Safety Injection

Note 3: On September 29, 1987 (Reference 1), the NRC Staff granted a permanent exemption for reverse-direction testing of this penetration. In July 1990, CYAPCO succeeded with some difficulty in direct-testing this penetration with air. This was documented in an NRC Inspection Report dated August 28, 1990 (Reference 4). CYAPCO intends to continue this approach for future testing. If our success in containing the air test volume by temporary means can be repeated, or if a permanent modification proves feasible, CYAPCO will submit a request for withdrawal of the permanent exemption. Until that time, CYAPCO requests that the existing permanent exemption remain in effect and that the supplemental exemption requested in our April 28, 1989 (Reference 2), submittal be granted.