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CONNECTICUT YANKEE ATOMIC POWER COMPANY

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November 13, 1978

Docket No. 50-213

Director of Nuclear Reactor Regulation
Attn: Mr. D. L. Ziemann, Chief
Operating Reactors Branch #2
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

- References: (1) W. G. Council letter to D. L. Ziemann dated June 12, 1978.
- (2) A. Schwencer letter to D. C. Switzer dated March 11, 1977.

Gentlemen:

Haddam Neck Plant
Proposed Exemptions to 10CFR50, Appendix J

In Reference (1), Connecticut Yankee Atomic Power Company (CYAPCO) submitted to the NRC Staff additional information in support of proposed exemptions to 10CFR50, Appendix J, Type B and C local test requirements. In addition, CYAPCO stated that a test of the Continuous Air Monitoring System (CMS) in the containment at the Haddam Neck Plant would be performed and that the evaluation of the test results would be submitted to the NRC Staff on or about August 10, 1978.

In a phone conversation on August 10, 1978, CYAPCO informed the NRC Staff that the above stated test had been completed. In addition, CYAPCO concluded that in light of the test results, it would not be prudent to attempt to base an exemption from the requirements of 10CFR50 Appendix J, for testing of the containment personnel hatch, on the CMS. CYAPCO stated that an alternate course of action would be developed and proposed.

Accordingly, CYAPCO proposes to comply with the relaxation of 10CFR50, Appendix J requirements, as proposed by the NRC Staff in Reference (2). As stated in Reference (2), at six-month intervals, the personnel hatch assembly shall be leak tested at the peak pressure, P_a . These tests are presently being performed. During the interval between the six-month tests, the personnel hatch assembly shall be leak tested within seventy-two (72) hours of every first of a series of openings. These tests shall be conducted whenever containment integrity is required.

For the intermediate tests, CYAPCO proposes to perform the tests at the reduced pressure of ten (10) pounds per square inch gage (psig) and conservatively extra-

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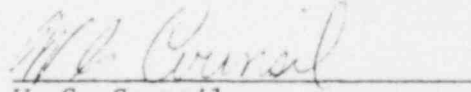
polate the results to a leakage rate at the peak (accident) pressure, P_A , to determine acceptability. The correlation between leakage at the reduced (test) pressure, P_T , and leakage at accident pressure, P_A , will follow the procedure outlined in 10CFR50, Appendix J for Type A tests, with the exception of the ratio of the test pressure to accident pressure. In this case, the reduced pressure value was chosen in consideration of time and equipment set-up constraints.

Although CYAPCO believes that the Continuous Air Monitoring System (CMS) is sufficient to detect any appreciable leakage through the personnel hatch, the procedure outlined above would provide better quantification of that potential leakage.

CYAPCO proposes to commence this testing procedure following the 1979 refueling outage. CYAPCO believes that the CMS in combination with "soap bubble" tests and visual inspections of the hatch seals provides sufficient assurance that any appreciable leakage through the personnel hatch will be detected during the interim period.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



W. G. Council
Vice President