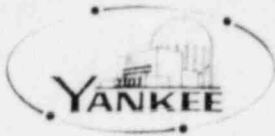


YANKEE ATOMIC ELECTRIC COMPANY



1671 Worcester Road, Framingham, Massachusetts 01701

July 30, 1982

Franklin Research Center
Twentieth and Race Streets
Philadelphia, PA 19103

Attention: Dr. Sudhakar Pandey

Reference: (a) Letter YAEC to NRC Office of Nuclear Reactor Regulations,
"Yankee Rowe Radiological Effluent Technical Specifications,"
proposed change No. 166-1 (WYR 79-5), January 16, 1979

Dear Dr. Pandey:

Revised Radiological Effluent Technical
Specifications for Yankee Nuclear
Power Station

Please find attached two (2) copies of our latest revision of Yankee's original proposed (reference (a)) Radiological Effluent Technical Specifications (RETS). This revision is the result of our April 13-14, 1982 meeting with members of your staff, along with our continued review of the subject material, and reflects our present understanding of the requirements necessary to meet the intent of the NRC's standard RETS as applied to operating reactors.

The information contained in our revised RETS does not at this time constitute a formal re-submittal of our original proposed change to the plant's technical specifications. We believe several items of non-agreement still exist on what constitutes acceptable means of demonstration of compliance with Federal regulations. As a result of discussions on July 20, 1982 between Mr. Andrew Cassell of your staff and Mr. Mark Strum of Yankee, it is our understanding that prior to a formal resubmittal of the Yankee RETS, additional review and discussion of all unresolved issues should take place between staff members of FRC, NRC, and Yankee Atomic with the objective of reaching a mutually agreeable resolution on all outstanding issues before re-submittal.

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Those items in our revised RETS which we believe to represent unresolved issues have been underlined to assist you in your review. However, due to the extent of the changes made to our original proposed RETS of 1979 which resulted from our July 13-14 meeting and from new information contained in the latest revisions to NUREG-0472, we suggest that the entire revision be reviewed in full. The following sections of the RETS are those major items which we feel further discussion with your staff will be necessary before final submittal of our proposed Tech. Spec. change:

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is to certify that the original has been sent to FRC. H. Smith 8/4/82

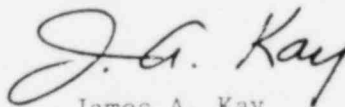
July 30, 1982

- 1) The need for a definition of "Process Control Program" (Page 1-5) which does not tie Technical Specification requirements to other than Federal regulations.
- 2) CHANNEL FUNCTIONAL TEST requirement on liquid and gaseous effluent monitors has been changed to reflect the capability of the existing system (Table 4.3-6, Page 3/4 3-36 and Table 4.3-7, Page 3/4 3-41).
- 3) The frequency of oxygen analysis per ACTION statement 20 (Table 3.3-9, Page 3/4 3-39) has been changed to once every 24 hours from the requested once per 8 hours. Due to the continuing evaluations underway by NRC on the subject of oxygen monitoring and the availability of reliable equipment, the ACTION statement should not be so severe that an undue burden for surveillance by plant personnel is imposed when actual operating history of Yankee does not reflect a need to do so.
- 4) The deletion of CHANNEL CALIBRATION and FUNCTION TEST requirements for the PVS flow rate measuring device (Table 4.3-7, Page 3/4 3-40) since it is not applicable to the type of equipment in use.
- 5) The re-defining of "Dose Rate" for noble gases per specification 3.11.2.1.a (Page 3/4 11-7) which we believe is in conformance with 10 CFR Part 20 as explained in the bases section of the RETS.
- 6) The Surveillance Requirements for specification 3.11.3 concerning the use of the "Process Control Program" to verify solidification of liquid waste (Page 3/4 11-15). Requirements of the PCP in terms of demonstration of acceptable performance should be stated in the PCP, not the technical specification.

Our staff will be available to discuss the resolution of these items and all other questions concerning our revised RETS. The completion and submittal of the updated ODCM for your review will follow shortly after the resolution of all outstanding RETS issues which bear on its use.

Please contact either Mr. Mark Strum or Mr. Peter Littlefield of our staff for further information or discussion of this topic.

Sincerely,



James A. Kay
Senior Engineer - Licensing

MSS/111

Attachment

cc: P.S. Littlefield

R. Caruso, NRC Project Manager
F. Congel, NRC Lead Engineer
C. Willis, NRC Lead Engineer