

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
WILSON WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

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

January 28, 1994

Docket No. 50-213
B14670

Re: 10CFR50.90

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

Gentlemen:

Haddam Neck Plant
Proposed Revision to Technical Specifications
Containment Leakage Surveillance Requirements

Pursuant to 10CFR50.90, Connecticut Yankee Atomic Power Company (CYAPCO) hereby proposes to amend its Operating License, DPR-61, by incorporating the attached proposed changes into the Technical Specifications of the Haddam Neck Plant.

Description of the Proposed Changes

Currently, Surveillance Requirement (SR) 4.6.1.2.d provides the requirements for 10CFR50 Appendix J, Type B and C testing, which is conducted at intervals no greater than once per 24 months. This SR also details exceptions to Type B and C testing for the containment air locks and purge supply and exhaust valves. An exception continues to be required for containment air locks because they are tested more frequently than the 24 month interval for Type B and C testing. An exception for the purge supply and exhaust valves exists, but this is unnecessary. Purge supply and exhaust valves receive a 10CFR50 Appendix J, Type B and C test once per refueling outage. Therefore, it is not necessary for SR 4.6.1.2.d to list purge supply and exhaust valves as an exception to the 10CFR50 Appendix J, Type B and C testing and this exception should be removed.

In addition to the above, the proposed changes will clarify the containment leakage surveillance requirements by removing SR 4.6.1.2.f. Presently SR 4.6.1.2.f could possibly imply that containment leakage surveillance requirements are met by conducting SR 4.9.9. However, SR 4.9.9 is applicable for core alterations or movement of irradiated fuel within the containment. SR 4.6.1.2.f is currently in a section applicable for Modes 1, 2, 3, and 4, a condition for which SR 4.9.9 is not applicable. This proposed change will remove SR 4.6.1.2.f.

020041

AD-17

Safety Assessment

The proposed changes remove SR 4.6.1.2.d which indicates that the purge supply and exhaust valves are an exception to the 10CFR50 Appendix J, Type B and C tests. However the purge supply and exhaust valves do receive a 10CFR50 Appendix J, Type B and C test. This is supported by current surveillance procedures which include the purge supply and exhaust valves as part of the Type B and C tests.⁽¹⁾⁽²⁾ In addition, the proposed changes are consistent with the Final Safety Analysis Report (FSAR). FSAR Table 7.3-1 "Containment Penetrations," lists the purge supply and exhaust valves as applicable to the Type B and C test. Therefore, these proposed changes revise SR 4.6.1.2.d to reflect actual surveillance procedures and offer no revisions or reductions to current surveillance testing.

The proposed changes will also clarify containment leakage surveillance requirements by removing SR 4.6.1.2.f. Currently, SR 4.6.1.2.f could potentially be interpreted to imply that by performing SR 4.9.9, containment leakage surveillance requirements would be met. However, SR 4.9.9 is applicable during core alterations or movement of irradiated fuel, not during the conditions in which containment leakage surveillance requirements are performed. The intent of SR 4.9.9 is to ensure that an access path to the purge supply and exhaust valves be maintained. This is required so that these valves may promptly be closed if the need for containment isolation should occur during core alterations or irradiated fuel movement. Therefore, the proposed changes to remove SR 4.6.1.2.f will not affect current safety functions and will serve to clarify containment leakage surveillance requirements.

Significant Hazards Consideration

In accordance with 10CFR50.92, CYAPCO has reviewed the attached proposed changes and has concluded that they do not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve an SHC because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change modifies SR 4.6.1.2.d. Currently this SR indicates the purge supply and exhaust valves have an exception from the 10CFR50

-
- (1) Connecticut Yankee Atomic Power Company Surveillance Procedure, "Local Leak Rate Testing of Containment Purge Air Supply," SUR 5.7-41, Revision 8, dated June 15, 1993.
 - (2) Connecticut Yankee Atomic Power Company Surveillance Procedure, "Local Leak Rate Testing of Containment Purge Air Exhaust," SUR 5.7-42, Revision 7, dated April 29, 1992.

Appendix J, Type B and C tests. The proposed technical specification change is consistent with current surveillance procedures and the FSAR. The second proposed change, which removes SR 4.6.1.2.f, reflects current containment leakage surveillance requirements. The present location of SR 4.6.1.2.f could imply that containment leakage surveillance requirements are met by performing SR 4.9.9. However, SR 4.9.9 is applicable only during core alterations or movement of irradiated fuel and not during the modes when Technical Specification 3.6.1.2 is applicable. These changes have no effect on actual Appendix J testing of valves or the current plant accident analysis. Therefore, the proposed changes cannot increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes do not introduce any new failure modes. The plant will continue to operate as designed and there will be no change to the testing of valves. The proposed changes will not modify the plant response to the point where it can be considered a new accident. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any previously evaluated.

3. Involve a significant reduction in a margin of safety.

The proposed changes modify SR 4.6.1.2.d which, as presently written, indicates that the purge supply and exhaust valves are an exception to the 10CFR50 Appendix J, Type B and C tests. The purge supply and exhaust valves do receive a 10CFR50 Appendix J, Type B and C test and therefore, no exception is required. This is supported by current surveillance procedures which include the purge supply and exhaust valves as part of the Type B and C tests. In addition, the proposed changes are consistent with the FSAR. FSAR Table 7.3-1 "Containment Penetrations," lists the purge supply and exhaust valves as required to receive Type B and C tests. Therefore, these proposed changes revise SR 4.6.1.2.d to reflect actual surveillance procedures and offer no revisions or reductions to current surveillance testing. Therefore, these changes will not result in a significant reduction in the margin of safety.

Moreover, the Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51FR7751) of amendments that are considered not likely to involve a SHC. Although the changes proposed herein are not enveloped by a specific example, the proposed changes do not constitute an SHC. As previously stated, the proposed changes revise SR 4.6.1.2.d so that the technical specifications no longer specify purge supply and exhaust valves as an exception to the 10CFR50 Appendix J, Type B and C test. This revision is consistent with current surveillance procedures and the FSAR. The proposed technical specification change also revises the containment leakage surveillance requirements by removing SR 4.6.1.2.f. SR 4.6.1.2.f invokes test and operability requirements

U.S. Nuclear Regulatory Commission
B14670/Page 4
January 28, 1994

for the purge supply and exhaust isolation valves pursuant to SR 4.9.9. This was misleading and has been corrected herein.

Environmental Consideration

CYAPCO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not increase the types and amounts of effluents that may be released off site, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, CYAPCO concluded that the proposed changes meet the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

The Haddam Neck Plant Nuclear Review Board has reviewed and approved the proposed license amendment and has concurred with the above determination.

Attachment 1 provides a markup of proposed changes, whereas Attachment 2 provides retyped pages of the Haddam Neck Plant Technical Specifications. The retype of the proposed changes to technical specifications in Attachment 2 reflects the current version of technical specifications. Technical specification changes previously submitted are not reflected in these pages. Therefore, the revised pages should be reviewed for continuity with the current technical specifications prior to issuance.

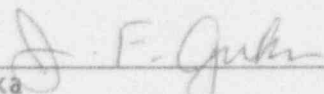
Regarding our proposed schedule for this amendment, we request issuance at your earliest convenience, with the amendment effective as of the date of issuance, to be implemented within 30 days of issuance.

In accordance with 10CFR50.91(b), we are hereby providing the State of Connecticut with a copy of this proposed amendment.

Should the Staff require any additional information to process this request, CYAPCO remains available to promptly provide such information.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



J. F. Opeka
Executive Vice President

cc: See Page 5

U.S. Nuclear Regulatory Commission
B14670/Page 5
January 28, 1994

cc: T. T. Martin, Region I Administrator
A. B. Wang, NRC Project Manager, Haddam Neck Plant
W. J. Raymond, Senior Resident Inspector, Haddam Neck Plant

Mr. Kevin T.A. McCarthy, Director
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
P.O. Box 5066
Hartford, CT 06102-5066

Subscribed and sworn to before me

this 28 day of January, 1994

Lorraine J. DiMico

Date Commission Expires: 3/31/98