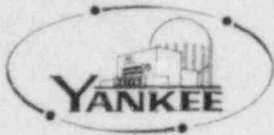


**YANKEE ATOMIC ELECTRIC COMPANY**

2.C.2.1.

FYR 82-99



1671 Worcester Road, Framingham, Massachusetts 01701

October 8, 1982

United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Mr. Richard W. Starostecki, SALP Board Chairman  
Director, Division of Project and Resident Programs

References: (a) License No. DPR-3 (Docket No. 50-29)  
(b) USNRC Letter to YAEC dated September 3, 1982

Subject: Systematic Assessment of Licensee Performance

Dear Sir:

We have reviewed the assessment of Reference (b) and concur with the overall content and board recommendations. However, we do wish to comment on one area where our discussions indicated a revision was warranted. We also wish to respond to the issue of the Primary Vent Stack (PVS) Monitor failure history.

#### Plant Operations

Under your discussion on "Plant Operations" it is our understanding that your statement on licensee corporate representative presence will be modified or removed, and a statement included to more clearly state the observation and concern.

#### Radiological Controls

On the subject of the PVS monitor failure history, the technical issue is accurately described, however, the licensee action taken needs clarification. We believe that the actions taken will demonstrate that the LERs have been evaluated thoroughly and an appropriate program implemented to ultimately resolve these problems.

In July 1981, as a result of a Plant Operations Review Committee recommendation, a study was initiated to evaluate the PVS system to enhance system reliability. A report was issued in early August, 1981, summarizing all system problems and indicated several failure mechanisms, moisture being the significant contributor. Based on this evaluation, two modifications were proposed:

- (1) installation of a redundant PVS monitor with its own air dryers, and
- (2) the removal of the existing air dryers and installation of heat tracing and a moisture trap.

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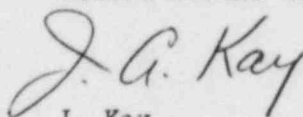
Both of the above proposed modifications were evaluated by the Nuclear Services Division, as requested by the Plant, and the final recommendation adopted was a phased program to resolve the problems. During the 1982 refueling outage the air dryers will be removed and heat tracing installed in conjunction with moisture trapping equipment. This modification will be monitored closely to determine the overall success and need for any further modifications.

We believe the above actions demonstrate responsible actions in response to the LERs and, by the decisions made, clearly included the necessary management attention to resolve this matter.

If you have any questions, or desire additional information, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



J. Kay  
Senior Engineer - Licensing

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