



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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January 5, 1983

Docket No. 50-213
B10641

Director of Nuclear Reactors Regulation
Attn: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U. S. Nuclear Regulatory Commission
Washington, DC 20555

- References:
- (1) D. M. Crutchfield letter to W. G. Council, dated May 7, 1982.
 - (2) W. G. Council letter to D. L. Ziemann, dated September 21, 1979.
 - (3) D. C. Switzer letter to A. Schwencer, dated June 27, 1977.
 - (4) E. J. Brunner letter to D. C. Switzer, dated January 2, 1975.

Gentlemen:

Haddam Neck Plant
Appendix J Requirements

Reference (1) transmitted Amendment 49 to Facility Operating License No. DPR-61 for the Haddam Neck Plant. This amendment issued changes to Appendix A Technical Specifications and incorporates requirements of Appendix J to 10CFR50 as requested by Reference (2) and (3).

In order to test the penetrations in accordance with the Franklin Research Center (FRC) Technical Evaluation Report (TER) attached to Reference 1, a number of containment penetrations will require modification or re-evaluation of the presence of a water seal during post accident periods. In addition, Connecticut Yankee Atomic Power Company (CYAPCO) is re-evaluating compliance with Appendix J by seismically qualifying the RCP seal water supply piping associated with penetrations P-74 through P-77. CYAPCO is currently investigating the possibility that it may be more cost effective to install containment isolation provisions which conform to the requirements of Appendix J rather than seismically supporting long runs of piping. CYAPCO is presently evaluating the cost/benefit associated with these two methods of complying with Appendix J.

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During the upcoming outage, scheduled to begin on January 22, 1983, CYAPCO intends to modify penetration P-20, pressurizer relief tank supply line and P-71, primary vent header to comply with Appendix J. The remainder of the penetrations will be qualified and modified as necessary during the two refueling outages following the 1983 outage. A detailed modification schedule is being developed and will be submitted on or about July 29, 1983.

Based on the long lead time for equipment needed to modify these penetrations, the level of design and analysis required, and the need to integrate these modifications with the ultimate requirements of the SEP review of containment isolation valve configurations, CYAPCO has concluded that the schedule for completion of these required modifications is consistent with the level of complexity and difficulty associated with these upgrades and with the increase in the level of safety resulting from these modifications.

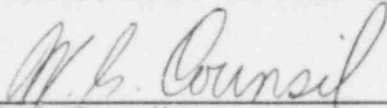
It should be noted that the issue of compliance of the Haddam Neck Plant to Appendix J was first introduced in early 1975 (Ref. 4) and a final Technical Specification and Safety Evaluation were not issued by the NRC until May 1982 (Ref 1) some seven and one half years later. During this time period numerous pieces of correspondence have flowed between the NRC staff and CYAPCO as indicated in Section 5 of the FRC TER in Reference (1) in an attempt to reach a final resolution of this issue. Now that final resolution has been reached sufficient time is required for proper engineering, design and installation of any required modifications.

Until these penetrations can be modified such that testing is in full compliance with the Staff's SER in Reference (1), CYAPCO will continue to perform leak rate testing by utilizing previously employed methods. This provides reasonable assurance that these containment isolation valves will be operable with acceptable leakage rates if they are required to operate.

As stated above, CYAPCO will provide the NRC staff with a detailed modification schedule on or about July 29, 1983.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



W. G. Council
Senior Vice President