



March 14, 1994

Docket No. 50-213  
B14754

Re: Regulatory Guide 1.97  
ISAP Topic 1.21

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

Haddam Neck Plant  
Conformance to Regulatory Guide 1.97, Revision 2

The purpose of this letter is to provide the NRC Staff with clarification of previously submitted information on the Containment Atmosphere Temperature variable for Regulatory Guide (RG) 1.97, Revision 2 for the Haddam Neck Plant (HNP).

Summary

The HNP credits instrumentation that deviates from the recommendations of RG 1.97 for the Containment Atmosphere Temperature variable. In a letter dated July 6, 1992,<sup>(1)</sup> Connecticut Yankee Atomic Power Company (CYAPCO) submitted a request for exceptions to these recommendations. In a letter dated December 20, 1993,<sup>(2)</sup> additional information regarding this variable was provided to supplement the justification for the deviations. This letter clarifies CYAPCO's position as stated in the previous submittals, and restates the exception requests with appropriate justification.

Background

The current status of the Containment Atmosphere Temperature variable, listed as variable D-24 for the HNP, was addressed in the July 6, 1992, submittal. An exception to both the design and qualification category and the instrument range was requested, and justification for the category exception was included. Based on subsequent discussions with the Staff, additional information regarding this variable was submitted in the letter dated December 20, 1993. Although this second letter stated that the included information

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- (1) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Conformance to Regulatory Guide 1.97, Revision 2," dated July 6, 1992.
  - (2) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Conformance to Regulatory Guide 1.97, Revision 2," dated December 20, 1993.

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superseded the previous request, it was intended that the additional information supplement rather than replace the earlier justification. Furthermore, CYAPCO did not restate the request for exceptions to the recommended category and instrument range. In order to preclude any potential confusion, CYAPCO's position on this variable is restated in its entirety in the following discussion.

### Discussion

RG 1.97 guidance recommends that the Type D Containment Atmosphere Temperature variable be monitored by Category 2 instrumentation with a range of 40 - 400°F. The recommendation to apply Category 2 design and qualification criteria presumes that containment temperature is a key variable for indicating postaccident system operating status for the plant. The recommended instrument range encompasses typical postaccident temperatures.

CYAPCO has not identified any postaccident operating procedures for the HNP which refer to containment temperature for accident monitoring or decision making. Operator decisions that are concerned with the containment environment are based on the use of containment pressure indication, which is RG 1.97 Category 1 instrumentation. As such, containment atmosphere temperature indication serves only as backup instrumentation to key variable containment pressure. Based on the importance to safety criterion specified in RG 1.97, CYAPCO has elected to utilize Category 3 instrumentation to the Containment Atmosphere Temperature variable for the HNP and requests an exception to the Category 2 recommendation. The existing containment atmosphere temperature instrumentation meets the design and qualification criteria for Category 3 variables.

The range of the containment atmosphere temperature instrumentation at the HNP is 0 - 150°F. An exception to the recommended range is requested. This range deviation is justified in that this instrument is not used postaccident for any monitoring or operator decision making, and would only be used on an as-available basis to provide backup indication for accomplishment of containment cooling.

### Conclusion

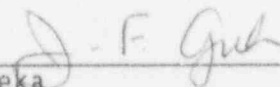
The containment atmosphere temperature instrumentation for HNP does not warrant classification as RG 1.97 Category 2. For HNP it would be used postaccident only as a backup to the containment pressure key parameter. Therefore, a design and qualification classification of Category 3 with the existing range of indication is appropriate for this variable. CYAPCO requests that the Staff accept the existing containment atmosphere temperature instrumentation as-is and grant exceptions to the recommended category and range for variable D-24.

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Please contact us if you have any questions.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

  
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J. F. Opeka  
Executive Vice President

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