

Maine Yankee

RELIABLE ELECTRICITY FOR MAINE SINCE 1972

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October 19, 1990
SEN-90-

US Nuclear Regulatory Commission
Washington DC 20555
Attention: Document Control Desk

- References:
- (a) License No. DPR-36 (Docket No. 50-309)
 - (b) USNRC Letter to MYAPCo dated April 25, 1989 - Emergency Response Capability - Conformance to Regulatory Guide 1.97, Revision 3.
 - (c) MYAPCo Letter to USNRC dated February 15, 1989 (MN-89-18)

Subject: Equipment Qualification Repair for Temporary Waiver of Compliance

Gentlemen:

With this letter, Maine Yankee requests a temporary waiver of compliance from Technical Specification 3.0.A requirements relating to the time constraints associated with completing a reactor shutdown and cooldown for non-conformance with a Limiting Condition for Operation. Specifically, Maine Yankee requests NRC concurrence to limit the shutdown rate to 5% rated power per hour, and to maintain the plant in the hot shutdown condition while repairs to equipment are completed.

At approximately noon time on October 19, 1990, Maine Yankee determined an environmentally qualified limit switch was not qualified due to improper installation of a Scotchcast conduit seal. There are 42 limit switches currently installed at Maine Yankee that could also have been improperly installed. Because of the nature of the failure and the number of conduit seals involved, Maine Yankee elected to declare all similar conduit seals non-qualified, and to commence a plant shutdown to effect repairs. The repairs are expected to be completed within seven days.

A 5% per hour shutdown rate is requested to minimize the impact on the four to six fuel pins currently estimated to be failed. By remaining in the hot shutdown condition, Maine Yankee expects to minimize the spread of contaminants associated with the failed fuel and to keep worker radiation exposures as low as reasonably achievable.

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We consider this request justified as it does not involve a significant hazards consideration. This conclusion is based on the following:

1. The limit switches in question are associated with Control Room indication of containment integrity valve position. Failure of the limit switches does not prevent closure of any containment integrity valve.
2. The containment integrity valves are regularly tested to verify valve operability.
3. The containment integrity valves associated have alternate means of isolation in all cases.
4. The likelihood of an accident requiring containment integrity during the period of this request is extremely remote.
5. There is no environmental impact associated with this request.

This request for compliance ~~will be~~ ^{has been} reviewed and approved by the Maine Yankee Plant Operations Review Committee. We appreciate your prompt attention to this matter.

Very truly yours,

SE Nichols

S. E. Nichols
Licensing Section Head

sen/cfh

c: Mr. Thomas T. Martin
Mr. Charles Marschall
Mr. E. Trottier