

NORTHEAST UTILITIES



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

General Offices • Seiden Street, Berlin, Connecticut

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

December 21, 1990

Docket No. 50-213

B13702

Re: Regulatory Guide 1.97, Rev. 2
ISAP Topic 1.21

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

Gentlemen:

Haddam Neck Plant
Conformance to Regulatory Guide 1.97, Rev. 2

On September 30, 1986, (1) Connecticut Yankee Atomic Power Company (CYAPCO) submitted a report for the Haddam Neck Plant describing how the provisions of Regulatory Guide 1.97, Revision 2, had been or would be met.

In the above-mentioned submittal, Containment Pressure and Hydrogen Monitoring instrumentation were listed as Type A, Category 1 variables. Upon further review, CYAPCO had determined this was an overly conservative categorization.

The Containment Pressure and Hydrogen Monitoring instrumentation have never actually been Type A variables in that they do not "provide the primary information required to permit the control room operator to take specific manually controlled actions for which no automatic control is provided and that are required for safety to accomplish their safety function for design basis accident events." Regarding containment pressure, no operator actions (e.g., containment spray) are anticipated or assumed for design basis accidents. Since this parameter is not used for spray initiation or other actions under these conditions, it does not meet the criterion for Type A variable selection.

(1) J. F. Opeka letter to C. I. Grimes, "Integrated Safety Assessment Program," dated September 30, 1986.

AP 03/10

U.S. Nuclear Regulatory Commission
B13702/Page 2
December 21, 1990

In letters dated March 4, 1983,⁽²⁾ November 17, 1986,⁽³⁾ and May 19, 1989,⁽⁴⁾ CYAPCO provided the Staff with justification for the use of the PASS system to monitor hydrogen concentration and clarified that no operator actions during a design basis accident event were determined by hydrogen concentration.⁽⁵⁾ The Staff concurred with these positions in their SER dated October 18, 1989.

The information on the two variables provided above is furnished in order to clarify certain points raised during the Regulatory Guide 1.97 audit performed during October 1990 and recent phone calls with the NRC Staff. This information was previously provided to the Staff during the Haddam Neck Plant audit.

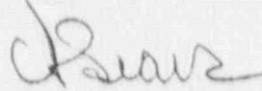
Please contact us if you have questions.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

FOR: E. J. Mroczka
Senior Vice President

BY:


C. F. Sears
Vice President

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

-
- (2) W. G. Council letter to D. M. Crutchfield, "Combustible Gas Control," dated March 4, 1983.
- (3) J. F. Opeka letter to C. I. Grimes, "Integrated Safety Assessment Program," dated November 17, 1986.
- (4) E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Combustible Gas Control Evaluation," dated May 19, 1989.
- (5) A. B. Wang letter to E. J. Mroczka, "ISAP Topic 1.23--Post Accident Hydrogen Monitors, dated October 18, 1989.