

# Maine Yankee

RELIABLE ELECTRICITY FOR MAINE SINCE 1972

EDISON DRIVE • AUGUSTA, MAINE 04336 • (207) 622-4868

January 8, 1991

MN-91-08

SEN-91-11

UNITED STATES NUCLEAR REGULATORY COMMISSION

Attention: Document Control Desk

Washington, DC 20055

- References:
- (a) License No. DPR-36 (Docket No. 50-309)
  - (b) USNRC Generic Letter 88-14 (Instrument Air Supply System Problems Affecting Safety-Related Equipment) dated August 8, 1988
  - (c) MYAPCo Letter to USNRC dated February 24, 1989
  - (d) USNRC Letter to MYAPCo dated April 24, 1989

Subject: Response to Generic Letter 88-14

Gentlemen:

As requested by Reference (b), Reference (c) provided a discussion of Maine Yankee's program for maintaining proper instrument air quality and the schedule for performance of a design and operations verification of the instrument air system. By Reference (d), the staff requested that when all requirements of the generic letter have been implemented, a written notification should be provided stating all actions are complete.

The design and operations verification of the instrument air system at Maine Yankee, as required by Generic Letter 88-14, is complete. This verification included:

NRC Item 1:

Verification by test that actual instrument air quality is consistent with the manufacturer's recommendations for individual components served.

Maine Yankee Response 1:

In lieu of verifying the instrument air quality requirements for each component, Maine Yankee adopted the approach of applying and testing the instrument air system quality in accordance with ANSI/ISA Standard S7.3. The criteria set forth by the ISA Standard is considered conservative with respect to component manufacturer's recommendations. This position is in line with the chairman of the committee that developed the standard as discussed in NSAC Document 137. In this document it states "the requirements were based on considering both the needs of air-operated instruments and the capabilities of commercially available equipment." As reported in NSAC 137, a majority of other utilities also use this ISA Standard as a basis for instrument air quality.

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A total of 12 samples were obtained from the three instrument air systems during the 1990 refueling outage. The samples were analyzed for dewpoint, oil mist and particulates and all results met ANSI/ISA - S7.3 specifications.

## NRC Item 2:

Verification that maintenance practices, emergency procedures, and training are adequate to ensure that safety-related equipment will function as intended on loss of instrument air.

## Maine Yankee Response 2:

In addition to the review conducted to prepare Maine Yankee's initial response to the Generic Letter [Reference (c)], maintenance practices, emergency procedures, and training were reviewed and documented in detail during a Maine Yankee internal vertical audit conducted in September and October 1989. This audit was conducted using the Maine Yankee Safeguards System Review Plan and re-verified the adequacy of Maine Yankee's instrument air program with respect to maintenance, procedures and training. Minor recommendations resulting from this instrument air system vertical audit are presently scheduled for completion.

## NRC Item 3:

Verification that the design of the entire instrument air system (including air and other pneumatic accumulators) is in accordance with its intended function, including verification by test that air-operated components will perform as expected in accordance with all design basis events, including a loss of the normal instrument air system. This design verification should include an analysis of current air operated component failure positions to verify that they are correct for assuring required safety functions.

## Maine Yankee Response 3:

An Instrument Air System Design Basis Document was prepared and issued in accordance with Maine Yankee Procedure MY-DBD-1, "Procedure for Developing Design Basis Summary Documents." Development of this document included an analysis of current air operated component failure positions to verify that they are correct for assuring required safety functions.

During the instrument air system internal audit (Item 2 above), the air accumulator design basis and functional testing was reviewed. One finding requires further analysis. The minimum recommended starting air pressures will be evaluated for incorporation into the functional testing procedures to determine the impact on the end pressures required to assure proper valve operation. This evaluation is scheduled to be completed by December 31, 1991.

# Maine Yankee

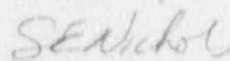
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Testing of instrument air components which perform a safety-related function was conducted during the 1990 refueling outage. This test was performed to verify the failure position of safety-related components upon the loss of air. All components returned to their expected failure position upon loss of instrument air.

Please contact us should you have any questions regarding this matter.

Very truly yours,



S. E. Nichols, Manager  
Nuclear Engineering & Licensing

SEN:SJJ

c: Mr. Thomas T. Martin  
M: E. H. Trottier  
Mr. Charles S. Marschall

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