CONNECTICUT YANKEE ATOMIC POWER COMPANY

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November 24, 1982 A01395

Mr. Ronald C. Haynes, Regional Administrator Region 1 U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, PA 19406

References:

- (1) B. H. Grier letter to W. G. Counsil dated November 21, 1980 transmitting I&E Bulletin. No. 80-24 (Docket No. 50-213).
- (2) W. G. Counsil letter to B. H. Grier dated January 5, 1981.
- (3) W. G. Counsil letter to R. C. Haynes dated June 1, 1982.

Gentlemen:

Haddam Neck Plant Response to I&E Bulletin No. 80-24

In Reference (1), the NRC requested that Connecticut Yankee Atomic Power Company (CYAPCo) take appropriate action to respond to the subject I&E Bulletin. CYAPCo forwarded its response in Reference (2). In Item 2.e. of Reference (2), CYAPCo stated that weekly containment entries were made to check for leakage in the service water as well as other systems. Since the time that Reference (2) was docketed CYAPCO has rescheduled its routine containment entries from weekly to monthly or as required by unusual conditions within containment. The reasons for extending the period between containment entries are as follows:

- o Fewer containment entries result in reduced personnel radiation exposure (especially neutron exposure) in accordance with ALARA.
- Containment entries involve stressful personnel conditions due to the elevated temperature and poor working conditions associated with a containment entry during power operation.
- o Frequent non-essential use of the air lock could result in accelerated door seal degredation and the need for more frequent repairs.

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 Each containment entry requires an air lock leak rate test which is time consuming and diverts personnel from other plant duties.

As stated in Reference (3), CYAPCo has installed redundant water level detection and indication in the lower level of containment as part of the TMI action plan item II.F.1.5 of NUREG-0737. Although all required environmental qualification documentation for this instrumentation is not presently available, CYAPCo concludes that this instrumentation is completely acceptable for service in a harsh environment and that the deficiency exclusively involves documentation. All required documentation to fully qualify this level instrumentation is expected by January 1, 1983. Additionally, full harsh environmental qualification is not as essential for this level instrumentation when used as a method to detect service water leakage since it would be exposed to normal containment temperatures and cool water rather then the high temperatures, pressures and radiation associated with post accident conditions.

CYAPCo has determined that the installation of this instrumentation coupled with the instrumentation and procedures described in Reference (2) and monthly inspection provide reasonable assurance of freedom from excessive service water leakage. Therefore, weekly containment entries are no longer appropriate.

CYAPCo will of course perform unscheduled containment entries if excessive leakage is suspected or other circumstances dictate such action.

We trust you find this information responsive to the Reference (1) request and we will continue to inform you of future changes to our plans and schedules, should they occur.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

W. G. Counsil

Senior Vice President

cc: D. M. Crutchfield