CONNECTICUT YANKEE ATOMIC POWER COMPANY

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September 21, 1982

Docket No. 50-213
B10566

Director of Nuclear Reactor Regulation
Attn: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

References: (1) W. G. Counsil letter to D. M. Crutchfield, dated December 14, 1981.

(2) W. G. Counsil letter to D. M. Crutchfield, dated April 1, 1982.

(3) D. M. Crutchfield letter to W. G. Counsil, dated August 26, 1982.

Gentlemen:

Haddam Neck Plant
SEP Topic II-3.B,
Flooding Potential and Protection Requirements
SEP Topic II-3.B.1,
Capability of Operating Plant to Cope
with Design Basis Flooding Conditions

In Reference (1), Connecticut Yankee Atomic Power Company (CYAPCO) submitted the Safety Assessment Report (SAR) for SEP Topic II-3.B, Flooding Potential and Protection Requirements, for the Haddam Neck Plant. Reference (1) identified the fact that, although a corresponding stage elevation had not been established, it was apparent that the water level in the Connecticut River would exceed site grade in the event of a Probable Maximum Flood (PMF). Reference (1) also stated that an emergency plan of action would need to be developed under SEP Topic II.3.B.1 to secure the plant under such an event.

Subsequent to the docketing of Reference (1), CYAPCO met with NRC Staff members at the Haddam Neck site to discuss possible actions which could be taken to protect the plant in the event of a PMF. The results of this meeting are summarized in the NRC site visit report dated March 8, 1982. Following the meeting, CYAPCO was requested to submit a formal plan for addressing the potential flooding problem.

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In Reference (2), CYAPCO provided the Staff with conceptual modifications which would be implemented at the plant independent of the Integrated Assessment in order to provide protection from a flood of stillwater elevation 30' MSL. These modifications consisted of bolt-on flood barriers, stop logs, and fiberglass enclosures. Since the docketing of Reference (2), some minor changes were effected on the proposed flood protection. For example, permanently installed (but normally open) watertight doors were used in locations where feasible and conditions permitted. Also, some additional barriers were included to eliminate other potential in-leakage pathways. The intent of these modifications was to provide flood protection up to elevation 30' MSL (site grade is at 21' MSL). Reference (2) also concluded that the recurrence frequency for a flood resulting in a stillwater elevation of 30' MSL was in the 10^{-4} to 10^{-5} per year frequency range.

In fulfillment of the Reference (2) commitment, the modifications required to provide protection to elevation 30' MSL were completed prior to September 1, 1982. Also, the attached Abnormal Operating Procedure, AOP 3.2-24, Flooding of the Connecticut River was implemented on September 1, 1982 thus making the flood protection system fully operational. The type and location of each flood barrier is described in the attached Abnormal Operating Procedure and indicated on Figure 1 of Attachment 1.

In Reference (2), CYAPCO also committed to evaluate the effects of the newly defined flood on existing safety-related structures to be completed prior to the Integrated Assesment for Haddam Neck. This analysis is continuing and is in keeping with the Staff's final evaluation of Topic III.3A, Effects of High Water Level on structures included in Reference (3).

Although CYAPCO has not yet received the Safety Evaluation Reports for the subject SEP topics, we trust that these modifications and the previous informal interactions between our respective Staff's will be sufficient to resolve the concerns that may arise from the evaluations of these topics. As of September 1, 1982 CYAPCO considers the issue of flood protection as defined by Topic II-3.B and Topic II-3.B.1 to be permanently resolved for the Haddam Neck Plant. It is our expectation that the Integrated Plant Safety Assessment Report will reflect this status.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

W. G. Counsil

W. G. Counsil
Senior Vice President