



June 9, 1994

Docket No. 50-213
B14832

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

Haddam Neck Plant
Proposed Resolution of SEP Topic III-6 Open Items

The purpose of this letter is for Connecticut Yankee Power Company (CYAPCO) to propose closure of the remaining open piping issues as identified in the Systematic Evaluation Program (SEP) Topic III-6, "Seismic Design Considerations."

The only remaining piping systems to be evaluated for seismic design considerations are the main steam, main feedwater, and service water piping systems outside containment. CYAPCO has decided to evaluate these systems as part of the Individual Plant Examination for External Events (IPEEE).

In response to Generic Letter 88-20, Supplement 4,⁽¹⁾ CYAPCO is performing an IPEEE to identify severe accident vulnerabilities due to external events and will submit the results to the NRC.

The purpose of the IPEEE is to evaluate external events, such as seismic events:

1. to develop an appreciation of severe accident behavior,
2. to understand the most likely severe accident sequences that could occur at the licensee's plant,
3. to gain a qualitative understanding of the overall probability of core damage and fission product releases, and
4. if necessary, to reduce the overall probabilities of core damage and radioactive material releases by modifying, where appropriate, hardware and procedures that would help prevent or mitigate severe accidents.

(1) Generic Letter 88-20, Supplement 4, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities - 10CFR50.54(f)," dated June 28, 1991.

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NUREG 1407⁽²⁾ provides additional guidance for the performance and submittal of the IPEEE. NUREG-1407 allows licensees three different methods to evaluate seismic events for the IPEEE: a seismic probabilistic risk assessment (PRA), an NRC margins methodology, or an EPRI margins methodology. As part of the IPEEE and as a method of closure for SEP Topic III-6, CYAPCO will implement a two-phase approach as outlined below.

The remaining piping systems requiring attention for SEP Topic III-6, (i.e., main steam, main feedwater, and service water piping outside containment) will be evaluated utilizing the EPRI seismic margins methodology.

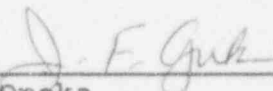
The results of the EPRI margins evaluation for the main steam, main feedwater, and service water system piping will contribute to the performance of a seismic PRA. The seismic PRA effort will indicate the seismic vulnerability of the piping systems in question for SEP Topic III-6 and will also evaluate the overall seismic capability of the Haddam Neck Plant.

In the past, the NRC Staff has endorsed the use of the IPEEE to close out SEP Topic III-6.⁽³⁾ We believe that this course of action proposed is also appropriate for the Haddam Neck Plant. If this two-phase evaluation identifies that modifications are warranted, they will be scheduled for implementation in accordance with the integrated implementation schedule as determined by the Integrated Safety Assessment Program.

Please contact Mr. E. P. Perkins, Jr. at (203) 665-3110 with any questions you may have.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



J. F. Opeka
Executive Vice President

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

(2) NUREG-1407, "Procedural and Submittal Guidance for the Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities," dated July 1990 (draft report for comment).

(3) J. F. Stang letter to D. L. Farrar, "Systematic Evaluation Program, Topic III-6, Structural Integrity of Reactor Pressure Vessel - Dresden Nuclear Power Station, Unit 2 (TAC No. M72906)," dated September 10, 1993.