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April 25, 1983

Docket Nos. 50-213 50-245 50-336 B10738

Mr. Darrell G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

References:

- (1) D. G. Eisenhut letter to All Operating Reactor Licensees, dated May 7, 1980.
- (2) W. G. Counsil letter to D. G. Eisenhut dated June 10, 1980.
- (3) W. G. Counsil letter to D. G. Eisenhut dated December 31, 1980.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit No. 1 and 2
NUREG-0737 Item II.K.3.3,
Reporting Safety and Relief Valve Failures and Challenges

In Reference (1), the Staff requested Licensees to implement mechanisms for reporting relief and safety valve failures and challenges to the NRC. Specifically, Reference (1) stated that future failures of a relief valve or safety valve to close should be reported promptly to the NRC and future challenges to relief valves or safety valves should be documented in the annual report.

It has recently come to our attention that the commitments to reporting failures and challenges made in response to Reference (1) were not consistent with the Staff's guidance and were thus open to misinterpretation. Therefore, Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) are clarifying the commitments made in References (2) and (3). CYAPCO's and NNECO's response to Item II.K.3.3 is as follows:

- Future failures of a relief valve to close will be reported promptly to the NRC.
- (2) Future challenges to the relief valves will be documented in the annual report.

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(c) Future failures of a safety valve to close will be reported promptly to the NRC.

(d) Future challenges to the safety valves will be documented in the annual report, unless the regulations or Technical Specifications require prompt reporting.

The above commitments are consistent with the intent of Section II.K of the TMI Action Plan - Loss of Feedwater and small-break LOCA generic review matters.

No response to this submittal is being requested of the Staff. The purpose of this letter is only to clarify CYAPCO's and NNECO's commitments to reporting of relief and safety valve challenges and failures.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil

Senior Vice President