U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-271/83-26

Docket No. 50-271

License No. DPR-28 Priority - Category C

Licensee: Vermont Yankee Nuclear Power Corporation
RD 5 Box 169, Ferry Road
Brattleboro, Vermont 05301

Facility Name: Vermont Yankee Nuclear Power Station

Inspection At: Vernon, Vermont

Inspection Conducted: August 29-September 2, 1983

Inspectors: c/p for S. Richards 10/31/83
S. Richards, Reactor Engineer date

c/p for S. Pullani 10/31/83
S. Pullani, Reactor Engineer date

Also participating in the inspection and contributing to the report were:

R. Eberly, Fire Protection Engineer, NRR
W. LeFave, Auxiliary Systems Branch, NRR
V. Lettieri, Mechanical Systems Specialist, BNL
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Approved by: Clifford J. Anderson 10/31/83
C. Anderson, Chief, date
Plant Systems Section

Inspection Summary: Inspection on August 29 - September 2, 1983 (Report No. 50-271/83-26) Areas Inspected: Special, announced inspection of the licensee's efforts to comply with the requirements of 10 CFR 50, Appendix R, Section III.G, concerning providing fire protection features to ensure the ability to achieve and maintain safe shutdown in the event of a fire. The inspection involved 257 inspector hours onsite.

Results: One violation was identified for failure to provide the fire protection features required by Appendix R, Section III.G.2 for equipment located primarily in the Reactor Building, paragraph 5.1.

## DETAILS

1. Persons Contacted

Vermont Yankee Nuclear Power Corporation

*D. Girroir, Fire Protection Coordinator
*S. Jefferson, Operations Supervisor
R. Lopriore, Senior Maintenance Engineer
*R. Pagodin, Engineering Support Supervisor
D. Philips, Senior Electrical Engineer
*D. Reid, Technical Services Superintendent
*R. Wanczyk, Senior Engineer
*W. Wittmer, Maintenance Superintendent

Yankee Atomic Electric Company

R. January, Senior I&C Engineer
R. McCoy, Senior Electrical Engineer
S. Osmond, Electrical Engineer
*E. Sawyer, Fire Protection Coordinator
H. Schaffer, Principal Engineer - Systems
*J. Sinclair, Licensing Engineer

Nuclear Utility Fire Protection Group

*S. Mahoney, Observer

USNRC

*W. Raymond, Senior Resident Inspector

Note: * - denotes those present at the exit interview on September 2, 1983.

2. Background

10 CFR 50.48 and 10 CFR 50, Appendix R became effective on February 17, 1981. Section III.G of Appendix R requires that fire protection be provided to ensure that one train of equipment necessary to achieve and maintain safe shutdown remains available in the event of a fire at any location within a licensed operating facility. For hot shutdown conditions, the systems necessary must be free of fire damage. For cold shutdown conditions, repair is allowed using in place procedures and materials available onsite with the provision that cold shutdown be achievable within 72 hours of the initiating event. Section III.G.2 lists specific options as follows to provide adequate protection for redundant trains of equipment located outside of the primary containment:

-- Separation by a fire barrier having a three hour rating.

-- Separation by a horizontal distance of at least 20 feet with no intervening combustibles and with fire detection and automatic fire suppression installed in the fire area.

-- Enclosure of one train in a fire barrier having a one hour rating in addition to having fire detection and automatic suppression installed in the fire area.

If the protection required by Section III.G.2 is not provided or the systems of concern are subject to damage from fire suppression activities, Section III.G.3 of the rule requires that an alternate or dedicated shutdown capability be provided which is independent of the area of concern. Any alternate or dedicated system requires NRC review and approval prior to implementation.

For situations in which fire protection does not meet the requirements of Section III.G, however such protection is deemed to be adequate by the licensee for the specific situation, the rule allows the licensee to request an exemption on a case-by-case basis. Such exemption requests are submitted to the NRC for review and approval and must be justified by the licensee on a technical basis.

3. Correspondence

All correspondence between the licensee and the NRC concerning compliance with Section III.G was reviewed by the inspection team in preparation for the site visit. Several items of correspondence were of particular note with regard to their impact on the inspection.

By letter dated July 31, 1981, the licensee proposed to provide an alternate shutdown capability for the control room, cable vault, and switchgear room. After review and discussion with the licensee concerning the proposed design, the NRC Office of Nuclear Reactor Regulation approved implementation of the alternate shutdown capability via a Safety Evaluation Report dated January 13, 1983.

By letter dated February 17, 1982, the licensee requested exemption from the Section III.G.3 requirement to place fixed fire suppression in the control room. This request was subsequently approved by the NRC. An additional exemption request was submitted by letter dated August 16, 1983, requesting relief from Section III.G.2 requirements for protection of redundant safe shutdown trains located at elevation 232 in the Northwest Corner Room of the Reactor Building. This request had not been acted upon by the NRC at the time of the inspection.

The NRC forwarded Generic Letter 81-12, dated February 20, 1981, to all licensees required to comply with Appendix R requirements. The purpose of the letter was to clarify to the licensees the Rule requirements and

to provide NRC staff positions concerning fire protection. The importance of Generic Letter 81-12 for the team inspection was that it specifically stated that licensees were required under the rule to reassess their facilities to determine whether the protection required by Section III.G.2 was satisfied.

4. Systems Requiring Protection

For a Boiling Water Reactor (BWR), systems are needed to perform the following functions in order to achieve hot shutdown:

-- Control reactivity
-- Provide reactor coolant makeup
-- Remove decay heat and control reactor pressure
-- Provide suppression pool cooling
-- Monitor process variables
-- Provide electrical distribution to the various components

The NRC assumes that for any given fire, the reactor will be manually shutdown by the operator at the start of the event, thereby controlling reactivity for a BWR. To provide reactor coolant makeup, the license has elected to utilize either the High Pressure Coolant Injection (HPCI) system or the Reactor Core Isolation Cooling (RCIC) System. Because both HPCI and RCIC draw steam from the reactor vessel, both systems remove decay heat while providing coolant makeup. The safety relief valves are also available to control reactor pressure and remove decay heat if necessary. Both the HPIC and RCIC turbines exhaust to the suppression pool. For this reason suppression pool cooling is required to maintain hot shutdown and is provided by the Residual Heat Removal (RHR) system. The ultimate heat sink is provided by the RHR service water system used in conjunction with either the station service water system or the alternate cooling system. The station Emergency Diesel Generators (EDG), the station AC power distribution system, and DC battery systems provide the necessary electrical power to operate the required components.

To achieve cold shutdown, the facility utilizes another mode of operation of the RHR system in combination with the service water or alternate cooling systems.

5. Review of Protection Provided to Redundant Trains

The team reviewed the systems required for safe shutdown and the physical location of the major components within the plant. Based on this review, several systems and areas were selected for an in-depth review to ascertain whether the requirements of Section III.G.2 had been met.

5.1 Reactor Building

The Vermont Yankee Reactor Building contains the following systems required for safe shutdown: HPCI, RCIC, RHR, RHR service water, reactor

vessel instrumentation, suppression pool instrumentation, and control, instrumentation, and power cables associated with the operation of these systems. The redundant trains of each system are generally located in opposite sides of the secondary containment and are, therefore, physically separated by a considerable distance. Fire detection sensors are located primarily on elevation 252 and below, on the refueling floor, and at the recirculation motor generator set area. Automatic fire suppression systems are provided in only two locations of the Reactor Building; at the electrical penetration area in the northwest corner of elevation 252 and at the recirculation motor generator set area.

The Reactor Building is considered under the rule to be one fire area in that the various elevations of the building and the rooms located on any given elevation are not separated by fire barriers having a three hour rating. The licensee did not propose an alternate shutdown capability for any systems located within the Reactor Building and therefore the licensee was required to provide protection as stated in Section III.G.2 of the rule. Discussions with licensee personnel indicated that no modifications had been implemented in the Reactor Building to meet the requirements of Section III.G beyond those modifications the licensee had previously made to comply with the NRC Branch Technical Position (BTP) 9.5-1. This BTP stated the NRC fire protection guidelines prior to Appendix R becoming effective. After touring the Reactor Building and noting the location of the various systems and the lack of automatic suppression systems between redundant components, the team concluded that the fire protection required by Section III.G.2 had not been provided for any systems necessary to achieve and maintain hot shutdown and cold shutdown located within the Reactor Building. The rule allows repairs to equipment needed for cold shutdown; however, the licensee had not prepared procedures nor provided materials for any such repairs and was, therefore, required to protect cold shutdown equipment to an equal level of that required for hot shutdown equipment.

The licensee was informed that the facility was in violation of 10 CFR 50, Appendix R, Section III.G in that the fire protection features required by Section III.G to be provided for systems and components important to safe shutdown were not provided for those systems and components located within the secondary containment of the Reactor Building (271/83-26-01).

The team proceeded to trace the cable routing of the various systems and to examine more closely component locations within the Reactor Building to determine specifically the facility's variance from the rule requirements. The power cables for both trains of the RHR, RHR Service Water, and Core Spray pumps enter the Reactor Building in the northwest corner room at elevation 232 and are enclosed in conduit which is separated by approximately four feet. The licensee has an exemption request, dated August 16, 1983, pending for this area. Both trains of power cables pass through a

wall into the torus area where the cables are routed in divergent cable trays to their respective trains of equipment located in the northeast and southeast corner rooms. Within the torus area, the redundant cable trays are separated by greater than 20 feet. The fire loading in the torus area appeared low, and numerous fire detection sensors are located throughout the area; however, no automatic suppression system has been provided. Similarly, the corner rooms containing the redundant RHR, RHR Service Water and Core Spray pumps are separated by an open distance of greater than 100 feet and are provided with fire detection; however, no automatic suppression has been provided.

Control and instrumentation cables associated with both trains and selected power cables are routed from the control structure into the Reactor Building through the northwest corner at elevation 252. This area was of particular interest in that a very heavy concentration of cables of both trains are located there. In addition, several cables associated with the licensee's alternate shutdown design are routed in this vicinity. The two trains are separated by approximately 20 feet; smoke detection has been provided in the area, and an automatic sprinkler system is installed beneath the lowest level of cable trays. The cables installed in the trays are not qualified as fire resistant per IEEE-383. The inspector determined that a fire originating outside the area covered by the sprinkler system could rapidly spread horizontally to the area containing redundant cables at a level above the sprinkler system. Because the sprinkler system does not provide a means of prompt extinguishment of a fire in the overhead cable trays, the inspector considered the protection provided in this area as unacceptable in complying with Section III.G.2 requirements.

The control cables for the valve operators of the HPCI and RCIC inboard containment isolation valves were traced for separation. These valves are of concern because they are located inside the inerted primary containment and are not readily accessible for manual operation. The valves are designated V13-15 for RCIC and V23-15 for HPCI. These valves are powered from MCC (Motor Control Center) 89B and MCC 9D, both of which are located on the east wall of the Reactor Building at elevation 252. The valve operators are both AC motors. When the cables were traced from the Reactor Building electrical penetration area to their respective MCC's, the control circuits were found to be routed such that the HPCI control cable, located in cable tray R330SII, passed within several feet of the RCIC control cable, located in conduit 11188JSIIX. Although, these valves are normally open, the rule requires protection be provided to ensure that fire induced failures will not prevent operation of safe shutdown equipment. The inspector reviewed the Control Wiring Diagrams for the two valves with licensee representatives and determined that for each valve, a hot short of the proper two conductors could result in valve closure. The inspector concluded that the two specific control cables were inadequately protected in that a rated fire barrier did not separate the cables, the cables were routed within 20 feet of each other, and fire detection and automatic suppression were not provided.

The separation of MCC 9D and MCC 89B was also observed to be insufficient. Although these MCC's are greater than 20 feet apart, there are intervening combustibles in the form of open cable trays which reduce the distance between the MCC's. In addition, there is no automatic suppression system in the area and a significant loading of combustible material exists in close proximity to the MCC's consisting of cotton anti-contamination clothing, plastic clothing, wooden benches and shelving.

The instrument racks for the reactor vessel level and pressure transmitters are primarily located on the 280 foot elevation of the reactor building, although several level transmitters are also located on elevation 252. This instrumentation was observed to have 20 feet of horizontal separation with no intervening combustibles; however, detection and automatic suppression were not provided.

A review of the physical layout of redundant trains of equipment in the Reactor Building indicated that an inherent general separation exists due to the trains being located on opposite sides of the primary containment. The combustible loading throughout the building appeared low overall and the general layout of equipment is such that the building is not congested and typically has numerous areas on each elevation where little or no combustible material is present. The team concluded that, although, the licensee had failed to provide the specific fire protection features required by Appendix R, Section III.G, the general configuration of equipment within the Reactor Building tends to minimize the net safety effect of the lack of the specific protection required by the Rule.

5.2 Emergency Diesel Generator (EDG) Rooms

The two EDG rooms are located at the southeast end of the turbine building at the station grade level. The team examined the protection provided to both rooms. Each EDG and its auxiliaries are located in a separate 3-hour rated enclosure. All access doors and penetration seals were found to be properly rated and in good condition. Each room is provided with a smoke detection system and a manually operated water sprinkler system.

Each EDG has an associated fuel oil day tank located in a separate 3-hour rated enclosure. A manual AFFF (Aqueous Film Forming Foam), hose line system is provided in the area for fire suppression.

The power cables from the EDG's to the 4KV switchgears were traced to determine their separation. These cables are routed in embedded conduit and through separate manholes between the EDG's and the Switchgear Rooms. Similarly, the power cables to the MCC's in the EDG rooms, which power the EDG auxiliaries, were found to be routed through embedded conduit and separate manholes. Cables which passed through the EDG rooms to the turbine building were reviewed to determine if any redundant cables required for proper EDG operation could be threatened by a fire adjacent to the EDG rooms, however, no such cables were identified.

Based on the above review, the protection provided the two EDG's was considered to be adequate.

5.3 Switchgear Room

The switchgear room is located on elevation 248 of the control building directly beneath the cable vault. The switchgear room contains both trains of 4KV and 480 volt switchgear. As part of their alternate shutdown design, the licensee divided the room into two sections by installing a one-hour rated wall between the two divisions. Both sections of the room are protected by a smoke detection system and an automatic total flooding carbon dioxide system. The team reviewed the construction of the wall and the installation of the suppression and detection systems for acceptability with no deficiencies noted. A number of cables and conduit were found to penetrate the wall between the two trains. A check of these cables indicated that they are not required for safe shutdown with two exceptions. Those cables required for safe shutdown had been protected by having a one-hour rated wrapping material placed around their conduits. All penetrations through the wall were examined and found to be properly sealed.

Cable routing for 125 VDC control power to the switchgear and the routing for various power feeders to MCC's located throughout the plant were traced to determine whether redundant trains could be threatened by a single fire. One deficiency was noted external to the switchgear room. The power cables to MCC 8B and MCC 9B are routed in conduits which are separated by approximately 19 feet and pass together through the personnel corridor leading to the northwest corner of the reactor building. No detection or automatic suppression is provided in this area. The MCC's provide power to various loads inside the Reactor Building, including motor operated valves for the RHR System. The licensee has provided protection for the power cables to MCC 9B inside the switchgear room and cable vault, however, not in the personnel corridor. The team determined that the installation was a further example of failure to provide the fire protection features required of Appendix R, Section III.G.2.

With regard to the protection provided to redundant trains within the switchgear room, the team determined that the modifications made by the licensee were adequate to comply with Section III.G.2 requirements. Although the licensee considered the modifications part of their alternate shutdown design and submitted their proposal to the NRC prior to the implementation, the protection provided is an option of Section III.G.2 and as such did not require NRC review or approval. Completion of the switchgear room modifications closes unresolved item (271/83-19-01).

6. Alternate Shutdown

The licensee elected to provide an alternate shutdown capability for the control room and cable vault. To ensure the capability to achieve safe shutdown for a fire in either area, the licensee's design allows operators to control the RCIC System, one train of the RHR and Service Water Systems, and the necessary electrical distribution, from locations remote to the areas of concern. For the RCIC and RHR Systems, remote control panels were installed at locations inside the Reactor Building. Modifications were made to selected switchgear breakers to allow isolation and local control of the breakers at the switchgear. Two new 125 VDC batteries were installed to provide control power to the new RCIC and RHR panels and to provide an alternate 125 VDC power source to the vital switchgears and EDG 1-1A. Isolation and transfer devices have been provided to interconnect the modifications with the existing plant systems.

Although the majority of the hardware modifications associated with the design have been installed, the alternate system was not yet operable and approved procedures for its use were not in place. The schedular requirements of 10 CFR 50.48 allow the licensee until the end of the next refueling outage to place the system in operation unless an outage of a specified duration occurs first. The team, therefore, concentrated its efforts in determining the overall acceptability of the design to meet the requirements of Section III.G.3 of the Rule.

The team observed the installed hardware and discussed the functions and system interaction of the equipment with licensee representatives. Selected portions of the design were reviewed in detail. The team ascertained that the design provided proper isolation of the alternate equipment from the fire areas of concern, the electrical devices used for circuit transfer and isolation were of an acceptable type, and the instrumentation provided was adequate to achieve safe shutdown in the event of a cable vault or control room fire. Additionally, the requirements of the rule to provide detection and suppression in the areas for which the alternate was provided had been met.

7. Procedural Review

Because the licensee had not yet declared their alternate shutdown equipment operable, and procedures for operation of the equipment were therefore not required to be in place, the team was only able to review draft procedures for alternate shutdown. Various points of the drafts were discussed with the licensee. Because a detailed walk-through of alternate shutdown procedures is an important aspect of this inspection, the NRC will conduct a review of the licensee's procedures after the alternate shutdown equipment is declared operable. This is designated as an Inspector Follow Item (271/83-26-02).

The alternate cooling system at Vermont Yankee was designed to provide a means of shutdown cooling in the event of a failure of the Vernon Dam resulting in a loss of water suction at the Intake Structure. This system also provides a secondary means of shutdown cooling in the event of a fire in the intake structure. The system operates by aligning the RHR Service Water pumps to take a suction from the end cell of the cooling tower. The water is used to cool shutdown loads such as the RHR heat exchangers, RHR pumps, and the EDG's. The water is then returned to the cooling tower where heat is released to the atmosphere.

Licensee procedure OP 2181, "Service Water/Alternate Cooling Operating Procedure," provides details for aligning the Alternate Cooling System. The team observed a walk through of the procedure by a Senior Reactor Operator to ascertain whether the system can be lined-up for operation in a relatively short period of time with the limited number of personnel that would be available on a backshift. Based on the walk through, the team determined that the system could be aligned and operational in sufficient time to provide cooling when needed, however several concerns arose that the licensee agreed to address. The team noted that the procedure generally does not provide efficient direction to the operator in that all steps capable of being performed at the same time in one area were not always grouped together so that the operator was forced to return to an area several times. This was apparently due to the procedure being written to align the Alternate Cooling System with the normal Service Water System still in operation with a failure of the Vernon Dam the primary concern. The licensee agreed to revise the procedure to provide more efficient direction for aligning Alternate Cooling in the event of a total immediate loss of Service Water, such as could result from a fire in the Intake Structure. This concern is designated as an Inspector Follow Item (271/83-26-03).

During the walk through, the team observed an apparent lack of emergency lighting in the torus area. Emergency lighting requirements are provided in Appendix R, Section III.J. Because the requirements of Section III.J are outside the scope of this inspection, the concern was not pursued, however an NRC inspection of the licensee's emergency lighting will be conducted at a future date. Until that inspection, this concern is unresolved (271/83-26-04).

Another concern with the procedure was the operability of valve SW-16B. This valve lines up the cooling tower basin to the RHR Service Water pump suction. The valve is a 24 inch manually operated valve and must be opened for the procedure to work. In discussions with the licensee, it could not be determined when, if ever, the valve had last been cycled. It was not feasible to cycle the valve during the inspection due to the plant being in operation and an approximate 80 psi differential existing across the valve. The licensee committed to cycle the valve at the next refueling outage and every refueling outage thereafter to ensure the valve's operability. This concern is designated an Inspector Follow Item (271/83-26-05).

8. Associated Circuits

Appendix R, Section III.G requires that protection be provided for associated circuits that could prevent operation or cause maloperation of redundant trains of systems necessary for safe shutdown. The circuits of concern are generally associated with safe shutdown circuits in one of three ways. An associated circuit may share a common power source with one train and be routed such that a fire could effect both trains; or, an associated circuit may be routed such that it shares a common enclosure in its routing with both trains; or, an associated circuit may be a circuit which, when damaged by a fire, could cause operation or malfunction of equipment that would inhibit safe shutdown.

The team reviewed the licensee's efforts to analyze and protect associated circuits. For the alternate shutdown systems, the licensee had analyzed for all three cases. The common enclosure concern was satisfied by providing fire barrier penetration seals and electrical isolation devices. Spurious signals were prevented by providing isolation and transfer switches for the appropriate circuits. For the common power source situation, the licensee performed a coordination study and determined that two cases existed where proper coordination was not evident. Coordination between the EDG 1-1A supply breaker and the 4160 bus 4 transformer T-9-1A load breaker was inadequate, and there was a lack of coordination between the 480 volt bus 9 supply breaker to MCC 9C and the largest load breaker from MCC 9C. The results of the coordination study had not been completely reviewed by the licensee at the time of the inspection and no corrective action had commenced. The licensee committed to correcting any coordination problems once review of the study is complete.

With regard to safe shutdown systems outside the scope of the licensee's alternate design, the team determined through discussions with licensee representatives that no specific analysis was performed. Relay and breaker coordination was considered during the initial plant design and whenever modifications have been made; however, no specific study has been conducted to verify proper protection for associated circuits. The primary area of concern is the Reactor Building due to the large concentration of safe shutdown equipment and cabling. The lack of an associated circuits study for the Reactor Building is a further example of the licensee's failure to provide the protection required by Section III.G.2 of the Rule. The licensee stated their intent to verify proper coordination throughout the plant.

9. Fire Brigade Training

Fire Brigade training was reviewed to determine whether protection of safe shutdown equipment was addressed. Fire Brigade knowledge of safe shutdown equipment is of concern due to the potential to inadvertently disable or damage redundant trains of equipment during fire suppression

activities. The inspector noted that although specific fire fighting pre-plans or procedures did not exist, the training lesson plan for Fire Brigade leadership, tactics, and strategy discusses the need to maintain control systems operational and to protect redundant safety related shutdown systems. Additionally, lesson plans for pre-fire strategy discuss the location of major plant components including safe shutdown equipment. While the concern of protecting safe shutdown equipment appeared to be generally addressed, the inspector noted that training would be enhanced if specific directions were given to the fire brigade that extinguishment actions must be carefully directed to prevent damage to redundant trains by the misapplication of extinguishing agents.

10. Conclusions

The team concluded that the licensee has made extensive modifications to provide an alternate shutdown capability for the control room and cable vault as allowed under Section III.G.3 of the Rule, and that as part of the alternate design, adequate fire protection has been provided for the switchgear room. The licensee has not satisfied the specific requirements of Section III.G.2 to provide fire protection to redundant safe shutdown equipment, primarily in the Reactor Building.

By letter dated November 24, 1980, the NRC forwarded to the licensee a revised Section 10 CFR 50.48 and a new Appendix R to 10 CFR 50, which was to become effective February 17, 1981. By letter dated February 20, 1981, the NRC forwarded Generic Letter 81-12 which clarified licensee responsibilities in responding to the requirements of Sections III.G, III.J, and III.O of Appendix R. Both documents stated that the specific requirements of Section III.G must be satisfied or an exemption requested, regardless of any previous approvals by the NRC for fire protection features of a facility.

Discussions with licensee representatives indicated that the licensee misinterpreted the Rule requirements. The alternate shutdown design was in part in response to the NRC Fire Protection Safety Evaluation Report (SER) dated January 13, 1978, which identified the control room, cable vault and switchgear room as specific areas of concern. With regard to the remainder of the plant, the licensee apparently concluded that, as a result of the fire protection modifications made to satisfy NRC concerns as stated in the SER, and due to the inherent train separation in the Reactor Building, adequate protection existed to ensure safe shutdown could be achieved in the event of a fire. The team concurred that the modifications made and the train separation tend to minimize the safety significance of the licensee's failure to meet specific rule requirements; however, the team concluded that the licensee's failure to properly respond to the rule is a serious concern.

11. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. An unresolved item disclosed during this inspection is discussed in paragraph 7.

12. Exit Interview

The inspection team met with the licensee representatives denoted in paragraph 1 at the conclusion of the inspection on September 2, 1983. The team leader summarized the scope and findings of the inspection. The NRC Senior Resident Inspector was present at the exit interview. The only written material presented to the licensee during the inspection was a letter from the Brookhaven National Laboratory to the NRC Office of Nuclear Reactor Regulation dated July 21, 1983. This letter addresses a generic concern associated with current transformers and was shown to the licensee to aid one of the team members in discussing the licensee's approach to the concern.