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June 19, 1984

SBN- 669 T.F. Q2.2.2

United States Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, PA 19406

Attention:

Mr. Richard W. Starostecki, Director Division of Project and Resident Programs

References:

- (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444
- (b) Telecon of July 14, 1983, A. L. Legendre (YAEC) to Eugene Kelley (NRC Region I)
- (c) PSNH Letter, dated August 12, 1983, "Interim 10CFR50.55(e) Reports; Attachments to NNS-1 Pipe Supports and Service Air System NNS Supports", J. DeVincentis to R. W. Starostecki
- (d) PSNH Letter, dated September 28, 1983, "Interim 10CFR50.55(e) Report; Attachments to NNS-1 Pipe Supports and Service Air System NNS Supports", J. DeVincentis to R. W. Starostecki
- (e) PSNH Letter, dated November 10, 1983, "Interim 10CFR50.55(e) Report; Attachments to NNS-1 Pipe Supports and Service Air System NNS Supports", J. DeVincentis to R. W. Starostecki
- (f) PSNH Letter, dated December 2, 1983, "Interim 10CFR50.55(e) Report; Service Air System NNS Supports", J. DeVincentis to R. W. Starostecki

Subject:

Interim 10CFR50.55(e) Report; Service Air System NNS Supports

Dear Sir:

On July 14, 1983, we reported a potential 10CFR50.55(e) item to Region I [Reference (b)] regarding supports for the Service Air System which carry a Non-Nuclear Safety (NNS) designation in spite of this systems proximity to safety-related equipment. The following information is being filed pursuant to the interim reporting provision of 10CFR50.55(e)(3).

A. Description of Deficiency

We have identified pipe supports on the Service Air System classified as Non-Nuclear Safety (NNS) which are located in proximity to safety-related equipment. The proper classification is

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Non-Nuclear Seismic (NNS-1), whereby the structural integrity of a support during a seismic/operating event is assured. We have also identified pipe supports associated with other systems that have been classified as NNS and are in proximity to safety-related equipment. This classification discrepancy on the supports that were designated as NNS rather than NNS-1 is due to the fact that this designation was instituted after these support designs were issued for construction. In addition, a portion of these supports, plus approximately 700 supports properly classified as NNS-1, do not have retrievable formal calculations.

On December 2, 1983 [Reference (f)], we accorded this item a reportable status due to the extensive duration of evaluation that would be required to absolutely determine whether this item meets the reportability criteria of 10CFR50.55(e).

Our evaluation of the support designs in question is nearly complete. A total of 1,362 pipe support points require an evaluation. Of this total, all but thirty-one support points remain to be evaluated.

The changes resulting from the evaluation of 2,331 support points to date are as follows:

- Two-hundred-twelve (212) pipe supports required a reclassification from NNS to NNS-1.
- 2. Sixty (60) pipe supports (some installed) required modifications to meet NNS-1 design criteria.

B. Analysis of Safety Implications

The failure of these pipe supports during a seismic/operating event could have adversely impacted the function of safety-related equipment.

C. Corrective Action

All pipe supports that do not meet the NNS-1 pipe support criteria will be modified to bring the support up to NNS-1 design requirements.

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We will notify your office when the evaluation of the remaining 31 support points has been completed.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

John DeVincentis Engineering Manager

cc: Atomic Safety and Licensing Board Service List

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