PSNH

Wendell P. Johnson
Vice President

Public Service of New Hampshire

New Hampshire Yankee Division

March 22, 1985

SBN- 782
T.F. B6.1.10

Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. H. R. Denton

References:
(a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444
(b) PSNH Letter, SBN-703, dated August 9, 1984, "Alternate Pipe Break Design Criteria", J. DeVincentis to G. W. Knighton
(c) PSNH Letter, SBN-705, dated August 21, 1984, "Safety Evaluation Report (SER) Outstanding Issue No. 5, 'Load Combinations, Design Transients, and Stress Limits'", J. DeVincentis to G. W. Knighton
(d) PSNH Letter, SBN-756, dated January 31, 1985, "Reactor Coolant Loop Pipe Break Elimination Benefits Summary", J. DeVincentis to G. W. Knighton

Subject: Application for Amendment to Construction Permits; Exemption from 10CFR50, Appendix A, General Design Criterion 4 (GDC-4)

Dear Sir:

Public Service Company of New Hampshire, the United Illuminating Company, Massachusetts Municipal Wholesale Electric Company, New England Power Company, Central Maine Power Company, The Connecticut Light and Power Company, Canal Electric Company, Montaup Electric Company, Bangor Hydro-Electric Company, New Hampshire Electric Cooperative, Inc., Central Vermont Public Service Corporation, Maine Public Service Company, Fitchburg Gas and Electric Light Company, Vermont Electric Generation and Transmission Cooperative, Inc., Taunton Municipal Lighting Plant, and Hudson Light & Power Company, as they are the Joint Holders of, and Permittees under, Construction Permits Nos. CPPR-135 and CPPR-136 hereby apply, pursuant to 10CFR Section 50.90, for an amendment to the above-numbered Construction Permits.

The amendment, if granted, would afford the Permittees partial exemption from 10CFR50, Appendix A, General Design Criterion 4 (GDC-4) as it applies to the postulation of longitudinal and circumferential pipe breaks in the Reactor Coolant System primary loop piping (hot leg, cold leg, and crossover leg

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piping). Grant of the amendment would eliminate the need to install pipe whip restraints on the primary loop piping and other hardware required to mitigate the dynamic effects of these breaks, including jet impingement and reactor cavity pressurization. The Permittees have also performed analyses under the assumption that these breaks and the loads generated by them are nonexistent, to demonstrate that the functional capability of essential Class 1 piping systems is maintained.

The technical foundation for Permittees' request for partial exemption from GDC-4 was submitted in Reference (b). A summary of the benefits associated with the partial exemption from GDC-4 was submitted in Reference (d). The functional capability of essential Class 1 piping systems was addressed in Reference (c). The aforementioned submittals, which support or are contingent upon granting of the amendment requested herein, are hereby incorporated by reference into this application.

The Application Fee ($150.00) required by 10CFR170.12(c) is remitted herein.

Very truly yours,

W P Johnson

W. P. Johnson
Vice President

cc: Atomic Safety and Licensing Board Service List

COMMONWEALTH OF MASSACHUSETTS)
)ss
MIDDLESEX COUNTY)

Then personally appeared before me, W. P. Johnson, who, being duly sworn, did state that he is a Vice President of Public Service Company of New Hampshire, that he is duly authorized to execute and file the foregoing request in the name and on the behalf of Public Service Company of New Hampshire and that the statements therein are true to the best of his knowledge and belief.

A. L. Legendre, Jr.

A. L. Legendre, Jr. Notary Public
My Commission Expires August 5, 1988

ALLEN L. LEGENDRE JR. NOTARY PUBLIC MASSACHUSETTS

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