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YANKEE ATOMIC ELECTRIC COMPANY



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WYR 78-81

October 20, 1978

United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Office of Nuclear Reactor Regulation
Dennis L. Ziemann, Chief

Reference: (a) License No. DPR-3 (Docket No. 50-29)
(b) USNRC letter to YAEC dated August 17, 1978

Dear Sir:

Subject: Systematic Evaluation Program Topic Assessment Review

Your letter, Reference (b), requested that we review eight essentially complete Systematic Evaluation Program (SEP) topic assessments, and confirm that the facts defining the Yankee Rowe plant are correct.

We have completed our review of the eight topic assessments and confirm that four of the topics (III-10.C, IV-3, V-9, and VI-7.A.2) are not applicable to Yankee Rowe, and that the facts defining Yankee Rowe are correct in the remaining four topics (IV-1.A, VI-7.D, VII-1.B, and XVII). In your conclusions for Topic VII-1.B, Trip Uncertainty and Setpoint Analysis Review of Operating Data Base, we believe that the extent of additional review under Topic XVI, Technical Specifications, should be defined (i.e. administrative, format etc.), since the technical issue has been totally resolved by your conclusion.

One of the principal objectives of the SEP is to document the adequacy of the oldest operating plants, and to justify deviations which arise when these plants are compared to current licensing requirements. Obviously, these older plants possess the greatest potential for the largest number of deviations within the total population of operating plants. A logical extension of conclusions drawn from the SEP is certification of the adequacy of newer plants, since the theoretically "worst case" (from a deviation standpoint) has been documented to be adequate. As a minimum, the number of issues brought forward for review on newer vintage plants should be drastically reduced by SEP. However, in review of the eight topic assessments provided to us, we find nothing which would allow extrapolation of your findings to enable resolution of any of these issues on a generic basis. It is absolutely essential that SEP assessments, which close-out issues for older plants, be generalized sufficiently to apply generically to all plants.

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United States Nuclear Regulatory Commission
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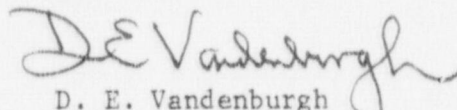
October 20, 1978
Page 2

An essential element in documentation is the reference to previous information upon which conclusions are drawn. The assessments prepared by the staff for documentation purposes, include few if any references, which we believe severely reduces their future value. Therefore, we encourage the staff to reissue these assessments with adequate references, as opposed to general discussions which may have less significance in future years.

We trust this information is satisfactory; however, should you desire additional information, please feel free to contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

A handwritten signature in dark ink, appearing to read "D. E. Vandenburg". The signature is fluid and cursive, with a long horizontal stroke at the end.

D. E. Vandenburg
Senior Vice President