## YANKEE ATOMIC ELECTRIC COMPANY

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580 Main Street, Bolton, Massachusetts 01740-1398

July 21, 1989 BYR 89-119

United States Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

References:	(a)	License No. DPR-3 (Docket No. 50-29)
	(b)	USNRC Letter to Yankee, dated May 2, 1989
	(c)	Yankee Letter to USNRC, dated September 11, 1987

Subject: Response to USNRC Generic Letter 89-08, "Erosion/Corrosion Induced Pipe Wall Thinning"

Dear sir:

In Reference (b), the USNRC requested Yankee to provide assurances that formalized procedures or administrative controls have been or will be implemented to ensure continued long-term implementation of the Yankee Nuclear Power Station's (YNPS) Erosion/Corrosion Monitoring Program.

Our Erosion/Corrosion Monitoring Program has been successfully applied during the past two refueling outrges. Briefly, our program consists of a systematic evaluation of single-phase and two-phase high energy carbon steel piping systems using criteria which closely follows the NUMARC guidelines contained in NUREG-1344. The details of the program were submitted to you in our response to Bulletin No. 87-01, Reference (c).

In summary, our response concluded that no significant pipe wall thinning, other than that attributed to normal wear, had occurred in single-phase piping at YNPS. Yankee also committed to perform future refueling inspections of high energy piping systems (single and two-phase), to establish realistic wear rates and subsequent inspection frequencies.

Since the submittal of Reference (c), Yankee has performed ultrasonic inspections during the 1988 refueling outage of base line locations established for monitoring during the 1987 refueling. The results of the 1988 inspections revealed no significant wear rate trend in single-phase piping systems within the scope of our inspection program. United States Nuclear Regulatory Commission Attention: Document Control Desk

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Yankee is presently in the process of establishing administrative controls to assure the continued implementation of this program. These controls will include the following:

- An inspection schedule based upon wear rate trending of susceptible 0 erosion/corrosion areas classified for monitoring.
- Separate procedures for safety-related piping. 0
- Administrative procedures which will be periodically reviewed to 0 address program scope and technical criteria.
- Frocedure(s) which will contain requirements for formal 0 documentation (records) of inspection results and repair/replacement of piping or components.

Yankee intends to complete these plant procedures before the next refueling outage, currently scheduled for June 1990. We consider the maintenance of high energy piping to be an important issue for plant and personnel safety. The development of administrative controls and plant inspection procedures will ensure that the requirements of Generic Letter 89-08 are satisfied at YNPS.

We trust that you will find this submittal satisfactory; however, if you have any questions or require additional information, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY Thankidge

L. Drawbridge Vice President and Manager of Operations

BLD/1ag/0414v

cc: USNRC Region I USNRC Resident Inspector, YNPS

COMMONWEALTH OF MASSACHUSETTS) )ss

MIDDLESEX COUNTY

Then personally appeared before me, B. L. Drawbridge, who, being duly sworn, did state that he is Vice President and Manager of Operations of Mankee Atomic Electric Company, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Yankee Atomic Electric Company and that the statements therein are true to the best of his knowledge and belief.

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Theren D. Sammarco

My Commission Expires November 7, 1991

Notary Public