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P.O. BOX 270 HARTFORD, CONNECTICUT 06141-0270 (203) 685-5000

July 31, 1989

Docket No. 50-213 B13284

Re: 10CFR50.90

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20:55

Reference: (1) E. J. Mroczka letter to U.S. NRC, Proposed Re ision to Technical Specifications, Section 3.6, Emergency Core Cooling Systems (ECCS), dated April 21, 1989.

Gentlemen:

Haddam Neck Plant Proposed Revision to Technical Specifications Section 3.6, Emergency Core Cooling Systems (ECCS) Additional Information

On April 21, 1989, pursuant to 10CFR50.90, Connecticut Yankee Atomic Power Company (CYAPCO) submitted a proposed amendment to Facility Operating License, DPR-61 by incorporating the proposed changes (Attachment 1 to Reference (1)) into the Technical Specifications of the Haddam Neck Plant. Specifically, Technical Specification Section 3.6 "Core Cooling Systems," Section 3.7, "Minimum Water Volume and Boron Concentration in the Refueling Water Storage Tank," and Section 4.3, "Core Cooling Systems - Periodic Testing," have been revised and combined into a new Section 3.6 titled, "Emergency Core Cooling Systems."

The purpose of this submittal is to respond to a verbal request from the NRC Staff for additional information (see Attachment 1) regarding the subject Technical Specification changes.

The proposed Technical Specification changes transmitted via Reference (1) have been revised to reflect the discussion with the Staff and are included herewith (Attachment 2). CYAPCO has reviewed the proposed changes in accordance with 10CFR50.92 and has determined that they involve no significant hazards consideration. It is noted that the previous significant hazards consideration discussion included in Reference (1) is still applicable for the above changes. The Had am Neck Plant Nuclear Review Board has reviewed and approved the proposed changes and has concurred with the above determinations.

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We believe the information included in Attachment 1 to this letter along with information provided in Reference (1), provides a complete basis for approval of the requested amendment. Of course, should the Staff have any additional questions, CYAPCO will be available to discuss the Staff's concerns.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

E. J. Myoczka Senior Vice President

cc: W. T. Russell, Region I Administrator

A. B. Wang, NRC Project Manager, Haddam Neck Plant

J. T. Shedlosky, Senior Resident Inspector, Haddam Neck Plant

Mr. Kevin McCarthy Director, Radiation Control Unit Department of Environmental Protection Hartford, Connecticut 06116

STATE OF CONNECTICUT)

(COUNTY OF HARTFORD ) ss. Berlin

Then personally appeared before me, E. J. Mroczka, who being duly sworn, did state that he is Senior Vice President of Connecticut Yankee Atomic Power Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

My Commission Expires March 31, 1993

## Attachment 1

Additional Information Regarding Technical Specification Change Section 3.6 "Emergency Core Cooling Systems"

#### Attachment 1

Haddam Neck Plant
Additional Information Regarding Technical Specification
Changes - Section 3.6, "Emergency Core Cooling Systems"

Item 1: Surveillance Requirement, d.2

Provide a basis for a 72-hour time window for completion of debris inspection.

#### Response:

Surveillance Requirement d.2 provides a 72-hour time window for completion of the debris inspection for entries made to do work with integrity already established. This would allow the performance of the containment debris inspection prior to the containment air lock test. This time window would allow the plant to perform one debris inspection for multiple containment entries made during the 72-hour period for the same job. Surveillance Requirement d.2 has been revised to clarify the relationship with the containment airlock testing.

Item 2: Surveillance Requirement e.1

Define the term "proper interlock" used in this surveillance requirement.

#### Response:

The design of the residual heat removal (RHR) system includes two isolation valves in each line connecting the high pressure reactor coolant system and the lower pressure RHR system. These valves are closed during normal operation and are opened only for residual heat removal during a plant cooldown after the RCS pressure is reduced to 300 psig or lower. These valves are provided with an interlock that prevents the valves from being opened when the RCS pressure exceeds 400 psig. This interlock protects the RHR system piping which has a design pressure of 500 psig. It is noted that the word "proper" is meant to describe the action, not the interlock.

#### Item 3

The existing Technical Specifications call for a periodic testing of the containment spray water valve during each refueling (Item D, Section 4.3). It is the Staff's position that it should not be deleted from the proposed Technical Specification changes.

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## Response

The proposed Technical Specification Section 3.6 has been modified to reinstate the deleted surveillance (see Surveillance Requirement g).

# Item 4 - Surveillance Requirement q

Provide a basis for a 60-months testing of the ECCS pump.

## Response

Surveillance requirement c.2 has been modified to include an additional test (i.e. verification of differential pressure on recirculation flow) on a monthly basis in lieu of surveillance requirement, g. The deleted surveillance (g) will be carried out as a part of the inservice testing program. The proposed additional surveillance requirement is consistent with the  $\underline{\underline{W}}$  STS.