

# YANKEE ATOMIC ELECTRIC COMPANY

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FYR 85-76

July 10, 1985

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

Attention: Mr. John A. Zwolinski, Chief  
Operating Reactors Branch No. 5  
Division of Licensing

References: (a) License No. DPR-3 (Docket No. 50-29)  
(b) YAEK Letter to USNRC, dated April 23, 1984 (FYR 84-51)  
(c) USNRC Letter to YAEK, dated December 3, 1984  
(d) YAEK Letter to USNRC, dated December 1, 1976 (WYR 76-125)

Subject: Low Temperature Overpressure Protection (LTOP)

Dear Sir:

In Reference (b), we indicated our plans to modify the LTOP System to provide intermediate setpoint adjustments to more suitably cover the range of temperatures and pressures through all operating modes. We also indicated that the progress of the revision to Regulatory Guide 1.99 would be closely monitored for its potential impact on our proposed system modifications.

Recent drafts of Regulatory Guide 1.99 have been reviewed; and the results show that substantial benefits will be gained in its use for adjusting the Appendix G curve, eliminating the need to make system modifications. Therefore, we have suspended activities on the modifications which were planned for the 1985 refueling outage until the draft Regulatory Guide is finalized and published (expected in early 1986). At that time, revisions to the Technical Specifications will be proposed to incorporate the methodology described in Regulatory Guide 1.99.

In the interim, the following actions will be continued in order to maintain the similar levels of protection as demonstrated in the original design basis:

1. The setpoint of the PORV shall be maintained in the low setpoint position until the Main Coolant System temperature is greater than or equal to 380°F.
2. Maintain a 400 psig margin between plant condition and the existing Appendix "G" curve above 300°F.

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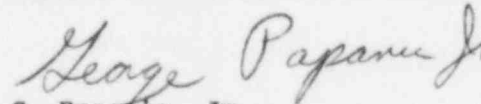
3. Station a dedicated operator at the control board during operations in which the Main Coolant System temperature is between 300°F and 450°F whose sole responsibility is to monitor Main Coolant System pressure, and the status of pressurizer heaters and bleed flow, the status of the safety injection pumps and valve lineup for added assurance to prevent/mitigate potential LTOP events.

It should be noted that Action 2 has been changed from that previously stated in Reference (b). The "above 300°F" has been added to allow starting the plant from a cold shutdown condition. This temperature limit has already been in use at the plant and is incorporated into the plant operating procedure. In addition, the pressure margin requirement has been reduced from 500 to 400 psig to maintain adequate margin to main coolant pump NPSH limits. The original requirement, in Reference (d), was established based on operator response time for inadvertent pressurizer heater operation prior to stationing a dedicated operator. This minor change in response time requirement is adequately compensated by the use of a dedicated operator. The upper limit temperature for stationing the operator in Action 3 has been increased from 440°F to 450°F, reflecting the shift in the Appendix G curve.

If this is not satisfactory or you have any questions, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



G. Papanic, Jr.

Senior Project Engineer - Licensing

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