



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

September 30, 1985

Docket No. 50-213
LS05-85-09-023

Mr. John F. Opeka, Senior Vice President
Nuclear Engineering and Operations
Connecticut Yankee Atomic Power Company
Post Office Box 270
Hartford, Connecticut 06141

Dear Mr. Opeka:

SUBJECT: ENVIRONMENTAL QUALIFICATION OF EQUIPMENT OUTSIDE CONTAINMENT

Re: Haddam Neck Plant

Connecticut Yankee Atomic Power Company (CYAPCo) was required to have the Haddam Neck Plant in conformance with the EQ rule by the end of the second outage after March 31, 1982. Your position is that in starting up after the August 1984 outage you were in conformance with the EQ rule for equipment located outside the containment. This position was based upon the use of the "feed and bleed" core cooling method following a high energy line break outside of containment in lieu of qualifying equipment important to safety located outside containment.

In our effort to issue the final safety evaluation report on environmental qualification for Haddam Neck, we have considered your proposed use of "feed and bleed" core cooling in response to high energy line breaks outside containment in lieu of qualification of a large amount of equipment outside containment. The staff has concluded that the use of "feed and bleed" as a permanent alternative to qualification of electrical equipment important to safety is not acceptable.

Our current understanding of the licensing bases for Haddam Neck does not include the use of "feed and bleed" as a method of mitigating the consequences of design basis accidents. Therefore, consistent with the requirements of 10 CFR 50.49, it is the staff's position that the systems identified by the licensee as necessary to mitigate the consequences of design basis accidents, including high energy line breaks outside containment, should be qualified to the environments in which the systems would be required to function.

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We emphasize that the use of "feed and bleed" has never been approved by the NRC as the primary means of mitigating any design basis accidents. To this end, substantial additional analysis would be needed to support the CYAPCo position and, in all likelihood, a Commission policy decision made concerning the overall approach.

In light of the information presented above, the staff now requires that a justification for continued operation be submitted immediately. Note that the staff has accepted, for other facilities, the limited use of "feed and bleed" in support of such a justification.

Sincerely,

Original signed by:

Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation

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Mr. John F. Opeka
Connecticut Yankee Atomic Power Company

Haddam Neck Plant

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