

# YANKEE ATOMIC ELECTRIC COMPANY

Telephone (617) 872-8100  
TWX 710-380-7619



1671 Worcester Road, Framingham, Massachusetts 01701

2.C.2.1  
FYR 85-94

September 4, 1985

United States Nuclear Regulatory Commission  
Washington, DC 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) USNRC Letter to All Licensees, dated May 23, 1985 (Generic Letter 85-09) (NYR 85-92)  
(c) YAEF Letter to USNRC, dated January 13, 1984 (FYR 84-09)  
(d) YAEF Letter to USNRC, dated November 5, 1983 (FYR 83-04)

Subject: Response to Generic Letter 85-09

Dear Sir:

Reference (b) requested licensees to submit proposed Technical Specification changes to require independent testing of the undervoltage and shunt trip attachments during power operations and independent testing of the Control Room manual switch contacts during each refueling outage. In response to Reference (b), on-line testing of the reactor trip breakers is not permissible at Yankee since the breakers are redundant in series and the opening of either breaker would result in a plant scram.

Reference (c) provides a detailed discussion of the Reactor Trip System. This reference also included an evaluation of the existing maintenance and inspection programs for these breakers as well as a system reliability analysis based on PRA. These evaluations have led to the following conclusions: (1) that modifications to permit on-line testing would not enhance the excellent 25-year reliability of the Yankee Reactor Trip System, and (2) that the present Reactor Trip System and supportive maintenance and inspection programs are an acceptable alternative to on-line testing.

Based upon the above, it is Yankee's position that changes to the Technical Specifications as requested by Reference (b) are neither warranted nor required for the Yankee plant.

*Handwritten:* A-001  
1/0

8509100220 850904  
PDR ADOCK 05000029  
P PDR

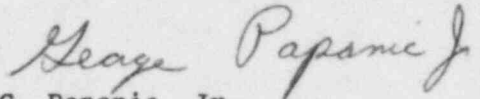
United States Nuclear Regulatory Commission  
Attention: Mr. John A. Zwolinski

September 4, 1985  
Page 2

We trust this information is satisfactory; however, if you have any further questions, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

A handwritten signature in cursive script, reading "George Papanic Jr.", written in dark ink.

G. Papanic, Jr.  
Senior Project Engineer - Licensing

GP/dps