



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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November 21, 1985

Docket No. 50-213
A04582

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission, Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

- References: (1) T. T. Martin letter to W. G. Council dated
December 28, 1984
(2) W. G. Council letter to T. T. Martin dated
February 25, 1985
(3) S.D. Ebnetter letter to J. F. Opeka dated
August 26, 1985

Gentlemen:

Haddam Neck Plant
Follow-up to Inspection Report No. 50-213/84-26
MEPL

Reference (1) transmitted the results of Inspection Report 50-213/84-26. Reference (2), which responded to that inspection report, delineated several commitments. Reference (3), which transmitted the results of Inspection Report 50-213/85-17 favorably addressed the status of most of the Reference (2) commitments. The Connecticut Yankee Atomic Power Company (CYAPCO) is in agreement with the conclusions of Reference (3). The purpose of this letter is to clarify the one Reference (2) commitment not addressed in Reference (3).

Reference (2) stated, in part: "By January 1, 1986, the majority of the information currently in the MEPL (excluding certain items such as consumables, pipe supports, etc.) will be incorporated

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into the automated Production Maintenance Management System (PMMS)." Since the MEPL is a somewhat complex document and the PMMS system's ability to replace it is limited, some clarification is in order.

The PMMS System is a component-based automated maintenance management system. To access information from PMMS for a given component, the component identification number must be used. This allows several "pages" of data on that component to be displayed. Part of that data is information on the QA Category of that component. This system lends itself well to aid in the storage and retrieval of QA Category (and, therefore, supports the MEPL) for certain components such as pumps, valves, motors, etc.

The MEPL has several parts. It includes guidance on determining the QA status of components, blanket statements to cover broad areas of QA applicability, (e.g., "All equipment within the fire protection program shall meet fire protection quality assurance requirements"), descriptions of structures which are QA and component by component listings of Category 1 equipment. This last area is compatible with the PMMS data base and it is this portion of the MEPL which we were addressing in the commitment quoted above. To rephrase that commitment: "All components (excluding certain items such as consumables, pipe supports, etc. and some minor subcomponents of electrical equipment) which are individually listed in the MEPL will have their PMMS QA indicators verified as properly reflecting their QA status by January 1, 1986." It should be noted that, currently, this commitment has been virtually completed.

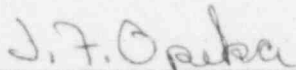
Other components in the PMMS system which are indicated as not QA have an evaluation referenced which is the basis for that status. Many components have their PMMS QA indicators "undefined," which according to our procedure (NEO 6.01, Material, Equipment and Parts Lists for In-Service Nuclear Generation Facilities) will require a QA evaluation prior to commencement of any work on the component. Any components which are not in the MMS data base are entered as the need arises with their QA indicators "undefined" and are evaluated as above.

In summary, the program we have established is one that will simplify quality assurance determinations while making them more rigorous and conservative. This will ensure that the proper controls will be utilized for each activity.

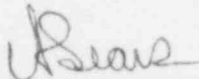
We do not believe that this letter changes the intent of any previous commitment and is provided for information only. My staff is available to answer any questions you may have on this.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



J. F. Opeka
Senior Vice President



By: C. F. Sears
Vice President