



March 12, 1999

Mr. Ted C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer
North Atlantic Energy Service Corporation
c/o Mr. Terry L. Harpster
P.O. Box 300
Seabrook, NH 03874

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE 24-MONTH SURVEILLANCE INTERVAL LICENSE AMENDMENT REQUESTS FOR THE SEABROOK STATION, UNIT NO.1 (TAC NOS. MA1429, MA1644 AND MA1947)

Dear Mr. Feigenbaum:

By letters dated April 3, 1998, April 22, 1998, and May 21, 1998, you submitted License Amendment Requests (LARs) 98-02, 98-04, and 98-05, respectively. All three LARs addressed "Changes In Technical Specification Surveillance Intervals To Accommodate A 24-Month Fuel Cycle Per Generic Letter 91-04."

In addition to your request to extend various surveillances from 18 months to 24 months, the LARs propose to delete the phrase "during shutdown" from the requirements that stipulate during which operating modes the surveillance tests may be performed. Those tests are shown in the enclosure to this letter. Please provide the following additional information.

1. For each surveillance test shown in the enclosure, provide a list of all the operational modes, other than shutdown (modes 5 and 6) during which you propose to perform the specific surveillance test.
2. For each mode listed for each surveillance test, describe the affect on the potential for unplanned plant transients and their associated safety concerns.

Also, your "Safety Assessment of Proposed Changes" for LARs 98-04 and 98-05 reaches conclusions that require further clarification. Please provide the following information.

3. At the end of each section in your "Safety Assessment of Proposed Changes," you include the statement, "In addition, the performance of the referenced surveillance at the bounding surveillance interval of 24 months plus 25% extension (30 months) does not adversely affect nor invalidate assumptions in the plant licensing basis." Please provide the justification for this conclusion including reference to those licensing basis documents reviewed in the process.

4. At the time that LARs 98-04 and 98-05 were submitted, the Seabrook Station had completed 5 fuel cycles. However, in your safety assessment of the proposed changes in LAR 98-04, the review of historical data appears to be incomplete and inconsistent. For example, on page 5, the review of historical data only included the "first three fuel cycles." On page 22, the review included only the "past three fuel cycles," and on page 35, the review included the "first four fuel cycles." Similarly, LAR 98-05 sometimes considered data from the first five cycles and at other times considered only the first four cycles. GL 91-04 requires that historical plant maintenance and surveillance data support the conclusion that the effect of surveillance interval changes on safety is small. Please confirm whether any historical data at Seabrook invalidates this conclusion along with a summary of the extent of your review.

Please provide the requested information by April 1, 1999 to support the review schedule for the subject LARs. This response date has been discussed with and agreed upon by Jim Peschel of your staff.

If you should have any questions regarding this request, please contact me at (301) 415-3199.

Sincerely,

/RA

John Harrison, Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No.: 50-443

Enclosure: Table of Technical Specifications Changes

cc w/encl: See next page

March 29, 1998

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Chief Nuclear Officer
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c/o Mr. Terry L. Harpster
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**Seabrook Technical Specifications Changes
Submitted with LAR's 98-02, 98-04, and 98-05
That Removed "DURING SHUTDOWN"**

#	Page	Section	Section Description	Item Description	Submittal
1	3/4 1-8	4.1.2.2.b	Boration Flow Paths	Proper auto valve alignment on SI	LAR 98-04
2	3/4 5-6	4.5.2.e.1	ECCS Subsystems	Proper auto valve alignment on SI and on Auto Switchover to Ctmt Sump	"
3	3/4 5-6	4.5.2.e.2	"	Auto pump start on SI (Centrifugal charging pump, SI pump, RHR pump).	"
4	3/4 5-7	4.5.2.h	"	ECCS Flow Balance	"
5	3/4 6-14	4.6.2.1.c.1	Containment Spray	Proper auto valve alignment on Ctmt Press Hi	LAR 98-02
6	3/4 6-14	4.6.2.1.c.2	"	Auto pump start on Ctmt Press Hi	"
7	3/4 6-15	4.6.2.2.c	Spray Additive	Proper auto valve alignment on Ctmt Press Hi	"
8	3/4 6-17	4.6.3.2	Ctmt Isolation	Proper auto valve alignment on Isolation signal (Phase A iso, Phase B iso, Ctmt purge, Ctmt exhaust)	LAR 98-04
9	3/4 7-4	4.7.1.2.1.c.1	Aux Feedwater	Proper auto valve alignment on Emergency FW System Actuation	"
10	"	4.7.1.2.1.c.2	"	Auto pump start on Emergency FW System Actuation	"
11	"	4.7.1.2.1.c.3	"	Manual pump start (incl. power and alignment) within time specs	"
12	"	4.7.1.2.1.c.4	"	Emergency FW control valve closes on hi flow	"
13	3/4 7-12	4.7.3.b.	PCCW	Proper auto valve alignment on ESFAS signal	LAR 98-02
14	3/4 7-13A	4.7.4.1.b	Service Water	Proper auto valve alignment on ESFAS signal	"
15	"	4.7.4.2.b.1	Ultimate Heat Sink	Proper auto valve alignment on ESFAS signal	"
16	"	4.7.4.2.b.2	"	Proper auto valve alignment on Tower Actuation signal	"
17	"	4.7.4.2.b.3	"	Auto pump start on TA signal	"
18	3/4 8-3	4.8.1.1.1.b	A.C. Sources	2 offsite sources demonstrated operable by manual & automatic transfer	LAR 98-05
19	3/4 8-5	4.8.1.1.2.f	"	15 EDG Tests (Load rejection, LOOP simulation, Auto start on SI, load synchronization, etc.)	"