



**North
Atlantic**

North Atlantic Energy Service Corporation
P.O. Box 300
Seabrook, NH 03874
(603) 474-9521

The Northeast Utilities System
April 14, 2000

Docket No. 50-443

AR# 00003296

NYN-00028

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Seabrook Station
License Amendment Request 00-03,
“Relocation of Certain Refueling Operations Technical Specifications
To The Technical Requirements Manual”

North Atlantic Energy Service Corporation (North Atlantic) has enclosed herein License Amendment Request (LAR) 00-03. LAR 00-03 is submitted pursuant to the requirements of 10CFR50.90 and 10CFR50.4.

License Amendment Request (LAR) 00-03 proposes changes to the Seabrook Station Technical Specifications (TS) sections TS 3/4.9.5 “Communications,” TS 3/4.9.6 “Refueling Machine,” and TS 3/4.9.7 “Crane Travel - Spent Fuel Storage Areas.” The proposed changes will relocate the subject Technical Specifications to the Seabrook Station Technical Requirements Manual (SSTR).

The SSTR is referenced in the Seabrook Station Updated Final Safety Analysis Report and is the implementing manual for the Technical Specifications Improvement Program. The proposed change is based on the NRC’s “Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors” (58 FR 39312), issued in July 1993, and the results of the NRC Staff review of WCAP-11618 as documented in a letter dated May 9, 1988 to R. A. Newton, Chairman of the Westinghouse Owners Group. This letter is generically referred to as the NRC STS Split Report.

LAR 00-03 has been reviewed and approved by the Station Operation Review Committee and the Nuclear Safety Audit Review Committee.

A001

As discussed in LAR Section IV of Enclosure 1, the proposed change does not involve a significant hazard consideration pursuant to 10CFR50.92. A copy of this letter and the enclosed LAR has been forwarded to the New Hampshire State Liaison Officer pursuant to 10CFR50.91(b).

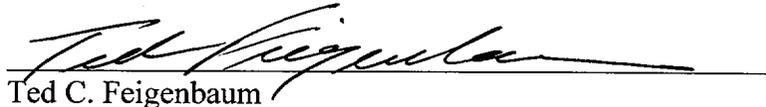
North Atlantic has determined that LAR 00-03 meets the criteria of 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement (see Section VI of Enclosure 1).

North Atlantic requests NRC Staff review of License Amendment Request 00-03 and issuance of a license amendment by September 15, 2000, becoming effective immediately and implemented within 60 days thereafter.

Should you have any questions regarding this letter, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.



Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer

cc: H. J. Miller, NRC Regional Administrator
R.M. Pulsifer, NRC Project Manager, Project Directorate 1-2
R. K. Lorson, NRC Senior Resident Inspector

Mr. Woodbury P. Fogg, P.E., Director
New Hampshire Office of Emergency Management
State Office Park South
107 Pleasant Street
Concord, NH 03301

ENCLOSURE 1 TO NYN-00028



**North
Atlantic**

SEABROOK STATION UNIT 1

**Facility Operating License NPF-86
Docket No. 50-443**

**License Amendment Request No. 00-03,
"Relocation of Certain Refueling Operations Technical Specifications
To The Technical Requirements Manual"**

This License Amendment Request is submitted by North Atlantic Energy Service Corporation pursuant to 10CFR50.90. The following information is enclosed in support of this License Amendment Request:

- Section I - Introduction and Safety Assessment for Proposed Change
- Section II - Markups of Proposed Changes
- Section III - Retype of Proposed Change
- Section IV - Determination of Significant Hazards for Proposed Change
- Section V - Proposed Schedule for License Amendment Issuance and Effectiveness
- Section VI - Environmental Impact Assessment

I, Ted C. Feigenbaum, Executive Vice President and Chief Nuclear Officer of North Atlantic Energy Service Corporation hereby affirm that the information and statements contained within this License Amendment Request are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

Sworn and Subscribed
before me this

14 day of April, 2000

Marilyn R. Sullivan
Notary Public

Ted C. Feigenbaum
Ted C. Feigenbaum
Executive Vice President and Chief Nuclear Officer

Section I

Introduction and Safety Assessment for the Proposed Change

INDEX

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

<u>SECTION</u>	<u>PAGE</u>
3/4.9.4 CONTAINMENT BUILDING PENETRATIONS	3/4 9-4
3/4.9.5 COMMUNICATIONS (THIS SPECIFICATION NUMBER IS NOT USED)	3/4 9-5
3/4.9.6 REFUELING MACHINE (THIS SPECIFICATION NUMBER IS NOT USED)	3/4 9-6
3/4.9.7 CRANE TRAVEL - SPENT FUEL STORAGE AREAS	3/4 9-7
3/4.9.8 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION	(THIS SPECIFICATION NUMBER IS NOT USED)
High Water Level	3/4 9-8
Low Water Level	3/4 9-9
3/4.9.9 CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM	3/4 9-10
3/4.9.10 WATER LEVEL - REACTOR VESSEL	3/4 9-11
3/4.9.11 WATER LEVEL - STORAGE POOL	3/4 9-12
3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM	3/4 9-13
3/4.9.13 SPENT FUEL ASSEMBLY STORAGE	3/4 9-16
FIGURE 3.9-1 FUEL ASSEMBLY BURNUP VS. INITIAL ENRICHMENT FOR SPENT FUEL ASSEMBLY STORAGE	3/4 9-17
3/4.9.14 NEW FUEL ASSEMBLY STORAGE	3/4 9-18
 <u>3/4.10 SPECIAL TEST EXCEPTIONS</u>	
3/4.10.1 SHUTDOWN MARGIN	3/4 10-1
3/4.10.2 GROUP HEIGHT, INSERTION, AND POWER DISTRIBUTION LIMITS	3/4 10-2
3/4.10.3 PHYSICS TESTS	3/4 10-3
3/4.10.4 REACTOR COOLANT LOOPS	3/4 10-4
3/4.10.5 POSITION INDICATION SYSTEM - SHUTDOWN	3/4 10-5
 <u>3/4.11 RADIOACTIVE EFFLUENTS</u>	
<u>3/4.11.1 LIQUID EFFLUENTS</u>	
Concentration	3/4 11-1
Dose	3/4 11-2
Liquid Radwaste Treatment System	3/4 11-3
Liquid Holdup Tanks	3/4 11-4
 <u>3/4.11.2 GASEOUS EFFLUENTS</u>	
Dose Rate	3/4 11-5
Dose - Noble Gases	3/4 11-6
Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form	3/4 11-7
Gaseous Radwaste Treatment System	3/4 11-8
Explosive Gas Mixture - System	3/4 11-9
3/4.11.3 SOLID RADIOACTIVE WASTES	3/4 11-10
3/4.11.4 TOTAL DOSE	3/4 11-12
 <u>3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING</u>	
3/4.12.1 MONITORING PROGRAM	3/4 12-1

REFUELING OPERATIONS

3/4.9.5 COMMUNICATIONS

(This specification number is not used.)

LIMITING CONDITION FOR OPERATION

3.9.5 Direct communications shall be maintained between the control room and personnel at the refueling station.

APPLICABILITY: During CORE ALTERATIONS.

ACTION:

When direct communications between the control room and personnel at the refueling station cannot be maintained, suspend all CORE ALTERATIONS.

SURVEILLANCE REQUIREMENTS

4.9.5 Direct communications between the control room and personnel at the refueling station shall be demonstrated within 1 hour prior to the start of and at least once per 12 hours during CORE ALTERATIONS.

REFUELING OPERATIONS

3/4.9.6 ~~REFUELING MACHINE~~ (This specification number is not used.)

LIMITING CONDITION FOR OPERATION

3.9.6 The refueling machine and auxiliary hoist shall be used for movement of drive rods or fuel assemblies and shall be OPERABLE with:

- a. The refueling machine used for movement of fuel assemblies having:
 - 1) A minimum capacity of 4000 pounds, and
 - 2) An overload cutoff limit less than or equal to 3900 pounds.
- b. The auxiliary hoist used for latching and unlatching drive rods having:
 - 1) A minimum capacity of 2100 pounds, and
 - 2) A load indicator which shall be used to prevent lifting loads in excess of 1000 pounds.

APPLICABILITY: During movement of drive rods or fuel assemblies within the reactor vessel.

ACTION:

With the requirements for refueling machine and/or hoist OPERABILITY not satisfied, suspend use of any inoperable refueling machine and/or auxiliary hoist from operations involving the movement of drive rods and fuel assemblies within the reactor vessel.

SURVEILLANCE REQUIREMENTS

4.9.6.1 The refueling machine used for movement of fuel assemblies within the reactor vessel shall be demonstrated OPERABLE within 100 hours prior to the start of such operations by performing a load test of at least 4000 pounds and demonstrating an automatic load cutoff when the refueling machine load exceeds 3900 pounds.

4.9.6.2 The auxiliary hoist and associated load indicator used for movement of drive rods within the reactor vessel shall be demonstrated OPERABLE within 100 hours prior to the start of such operations by performing a load test of at least 2100 pounds.

REFUELING OPERATIONS

3/4.9.7 ~~CRANE TRAVEL - SPENT FUEL STORAGE AREAS~~ (This specification number is not used.)

LIMITING CONDITION FOR OPERATION

3.9.7 Loads in excess of 2100 pounds shall be prohibited from travel over fuel assemblies in the storage pool.

APPLICABILITY: With fuel assemblies in the storage pool.

ACTION:

- a. With the requirements of the above specification not satisfied, place the crane load in a safe condition.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.7 Crane interlocks that prevent crane travel with loads in excess of 2100 pounds over fuel assemblies shall be demonstrated OPERABLE within 7 days prior to crane use and at least once per 7 days thereafter during crane operation.

3/4.9 REFUELING OPERATIONS (Continued)

BASES

3/4.9.5 COMMUNICATIONS (THIS SPECIFICATION NUMBER IS NOT USED.)

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS.

3/4.9.6 REFUELING MACHINE (THIS SPECIFICATION NUMBER IS NOT USED.)

The OPERABILITY requirements for the refueling machine ensure that: (1) refueling machine will be used for movement of drive rods and fuel assemblies, (2) each hoist has sufficient load capacity to lift a drive rod or fuel assembly, and (3) the core internals and reactor vessel are protected from excessive lifting force in the event they are inadvertently engaged during lifting operations.

3/4.9.7 CRANE TRAVEL - SPENT FUEL STORAGE AREAS (THIS SPECIFICATION NUMBER IS NOT USED.)

The restriction on movement of loads in excess of the nominal weight of a fuel and control rod assembly and associated handling tool over other fuel assemblies in the storage pool ensures that in the event this load is dropped: (1) the activity release will be limited to that contained in a single fuel assembly and (2) any possible distortion of fuel in the storage racks will not result in a critical array. This assumption is consistent with the activity release assumed in the safety analyses.

3/4.9.8 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION

The requirement that at least one residual heat removal (RHR) loop be in operation ensures that: (1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor vessel below 140°F as required during the REFUELING MODE, and (2) sufficient coolant circulation is maintained through the core to minimize the effect of a boron dilution incident and prevent boron stratification.

The requirement to have two RHR loops OPERABLE when there is less than 23 feet of water above the reactor vessel flange ensures that a single failure of the operating RHR loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and at least 23 feet of water above the reactor pressure vessel flange, a large heat sink is available for core cooling. Thus, in the event of a failure of the operating RHR loop, adequate time is provided to initiate emergency procedures to cool the core.

SECTION III

Retypes Of Proposed Changes

The attached retypes reflect the currently issued version of the Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

I. INTRODUCTION AND SAFETY ASSESSMENT OF THE PROPOSED CHANGE

A. Introduction

License Amendment Request (LAR) 00-03 proposes changes to the Seabrook Station Technical Specifications (TS) on the basis of the NRC's "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (58 FR 39312), issued in July 1993, and the results of the NRC Staff review of WCAP-11618 as documented in a letter dated May 9, 1988 to R. A. Newton, Chairman of the Westinghouse Owners Group (generically referred as the NRC STS Split Report). The proposed change involves the relocation of three Refueling Operations Technical Specifications, TS 3/4.9.5, "Communications," TS 3/4.9.6, "Refueling Machine," and TS 3/4.9.7, "Crane Travel - Spent Fuel Storage Areas," to the Seabrook Station Technical Requirements Manual (SSTR). The SSSTR is referenced in the Seabrook Station Updated Final Safety Analysis Report and is the implementing manual for the Technical Specification Improvement Program.

The NRC's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" provided a specific set of four (4) objective criteria to determine which of the design conditions and associated surveillances should be located in the TSs as limiting conditions for operation. The Final Policy Statement noted that implementation of these additional criteria, as amended to 10 CFR 50.36, may cause some requirements presently in TSs to no longer merit inclusion in TSs. The NRC STS Split Report, Appendix B, Table 2, "Westinghouse Standard Technical Specifications LCOs Which May Be Relocated," specifically references these Refueling Operation LCOs as meriting relocation (to a licensee-controlled document).

The Seabrook Station Technical Requirements Manual (SSSTR) is a licensee-controlled document which contains certain technical requirements and is the implementing manual for the Technical Specification Improvement Program. Changes to these requirements are reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7.1.i, and as outlined in the SSSTR. Specifically, all changes to the SSSTR require a 10 CFR 50.59 safety evaluation and be reviewed and approved by the Station Operations Review Committee (SORC) prior to implementation.

B. Proposed Specifications To Be Revised

Index Section 3/4.9.5	Communications
Index Section 3/4.9.6	Refueling Machine
Index Section 3/4.9.7	Crane Travel - Spent Fuel Storage Areas
Specification 3/4.9.5	Communications
Specification 3/4.9.6	Refueling Machine
Specification 3/4.9.7	Crane Travel - Spent Fuel Storage Areas
Bases Specification 3/4.9.5	Communications
Bases Specification 3/4.9.6	Refueling Machine
Bases Specification 3/4.9.7	Crane Travel - Spent Fuel Storage Areas

DESCRIPTION OF THE TECHNICAL SPECIFICATION CHANGE REQUEST

Changes to Index Section 3/4.9.5:

Deleted the word "COMMUNICATIONS" and replaced it with the following: "THIS SPECIFICATION NUMBER IS NOT USED"

Changes to Index Section 3/4.9.6:

Deleted the words "REFUELING MACHINE" and replaced it with the following: "THIS SPECIFICATION NUMBER IS NOT USED"

Changes to Index Section 3/4.9.7:

Deleted the words "CRANE TRAVEL - SPENT FUEL STORAGE AREAS" and replaced it with the following: "THIS SPECIFICATION NUMBER IS NOT USED"

Changes to Specification 3/4.9.5:

- Deleted the word "COMMUNICATIONS" and replaced it with the following: "(This specification number is not used.)"
- Deleted the "LIMITING CONDITION FOR OPERATION," the "APPLICABILITY," the "ACTION" and "SURVEILLANCE REQUIREMENTS" sections.

Changes to Specification 3/4.9.6:

- Deleted the word "REFUELING MACHINE" and replaced it with the following: "(This specification number is not used.)"
- Deleted the "LIMITING CONDITION FOR OPERATION," the "APPLICABILITY," the "ACTION" and "SURVEILLANCE REQUIREMENTS" sections.

Changes to Specification 3/4.9.7:

- Deleted the word "CRANE TRAVEL - SPENT FUEL STORAGE AREAS" and replaced it with the following: "(This specification number is not used.)"
- Deleted the "LIMITING CONDITION FOR OPERATION," the "APPLICABILITY," the "ACTION" and "SURVEILLANCE REQUIREMENTS" sections.

Changes to Bases Specification 3/4.9.5:

- Deleted the word "COMMUNICATIONS" and replaced it with the following: "(THIS SPECIFICATION NUMBER IS NOT USED.)"
- Deleted the remaining section.

Changes to Bases Specification 3/4.9.6:

- Deleted the word "REFUELING MACHINE" and replaced it with the following: "(THIS SPECIFICATION IS NOT USED.)"
- Deleted the remaining section.

Changes to Bases Specification 3/4.9.7:

- Deleted the word "CRANE TRAVEL - SPENT FUEL STORAGE AREAS" and replaced it with the following: "(THIS SPECIFICATION IS NOT USED.)"
- Deleted the remaining section.

C. Safety Assessment

The proposed changes to Technical Specifications 3/4.9.5, 3/4.9.6 and 3/4.9.7 and the associated Bases and Index sections are administrative in nature and do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, configuration of the facility.

In November 1987, the Westinghouse Owners Group submitted to the NRC Staff, WCAP-11618, "Methodically Engineered, Restructured and Improved Technical Specifications, Merits Program - Phase II Task 5, Criteria Application." The topical report applied the Commission's screening criteria to the Westinghouse Standard Technical Specifications (NUREG-0452, Revision 4 and draft Revision 5). The NRC Staff documented the results of their review of WCAP-11618 in a letter dated May 9, 1988 to R. A. Newton, Chairman of the Westinghouse Owners Group. Among the Westinghouse Standard Technical Specifications identified in Table 2 which may be relocated are LCOs 3.9.5 Communications, 3.9.6 Manipulator Crane and 3.9.7 Crane Travel - Spent Fuel Storage Pool. As such, the inclusion of the subject specifications in Technical Specifications is not specifically required by 10 CFR 50.36.

TS 3/4.9.5 requires that direct communications be maintained between the control room and personnel at the refueling station during core alterations. The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during core alterations.

TS 3/4.9.6 defines the minimum capacity and overload cutoff limits for the refueling machine and the minimum capacity load limits for the auxiliary hoist during the movement of drive rods or fuel assemblies within the reactor vessel. The operability requirements for TS 3/4.9.6 ensure that the refueling machine will be used for movement of drive rods and fuel assemblies. Additionally, the subject specification ensures that any possible distortion of fuel in the rack will not result in a critical array.

TS 3/4.9.7 defines that loads in excess of 2100 pounds are prohibited from travel over fuel assemblies in the storage pool. This requirement ensures that the activity release will be limited to that contained in a single fuel assembly and the possible distortion of fuel in the storage racks will not result in a critical array in the event that a load is dropped.

The proposed changes to relocate Specifications 3/4.9.5, 3/4.9.6 and 3/4.9.7 to the Technical Requirements Manual will maintain adequate controls for communication between the control room and personnel at the refueling station during refueling operations, the operation of the refueling machine and auxiliary hoist during the movement of drive rods or fuel assemblies, and the operation of the spent fuel pool crane with assemblies in the storage pool. The subject specifications relocated to the Technical Requirements Manual will continue to be administratively controlled in accordance with TS Section 6.0, "Administrative Controls." The applicable Index and Bases sections are revised to identify that the subject specifications will no longer be used.

The Seabrook Station Technical Requirements Manual is a licensee-controlled document which contains certain technical requirements and is the implementing manual for the Technical Specification Improvement Program. Changes to these requirements are reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7, and as outlined in the Technical Requirements Manual. Specifically, all changes to the Technical Requirements Manual require a 10 CFR 50.59 safety evaluation and be reviewed and approved by the Station Operations Review Committee (SORC) prior to implementation.

In conclusion, the activities controlled by the subject specifications do not need to be included within the scope of the Technical Specifications. The subject activities are adequately controlled in the Technical Requirements Manual. The inclusion of the subject specifications in Technical Specifications is not specifically required by 10 CFR 50.36, or other regulations. Additionally, the activities controlled by the subject specification do not pose a threat to the public health and safety. Therefore, the proposed changes to the subject Technical Specifications, Index and identified Bases sections do not affect plant safety.

Section II

Markups Of Proposed Changes

The attached markup reflects the currently issued revision of the Technical Specifications and Bases listed below. Pending Technical Specifications or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed markup

The following Technical Specifications and Bases are included in the attached markups:

Technical Specification	Title	Page(s)
Index Section 3/4.9.5	Communications	ix
Index Section 3/4.9.6	Refueling Machine	ix
Index Section 3/4.9.7	Crane Travel - Spent Fuel Storage Areas	ix
Specification 3/4.9.5	Communications	3/4 9-5
Specification 3/4.9.6	Refueling Machine	3/4 9-6
Specification 3/4.9.7	Crane Travel - Spent Fuel Storage Areas	3/4 9-7
Bases Specification 3/4.9.5	Communications	B3/4 9-3
Bases Specification 3/4.9.6	Refueling Machine	B3/4 9-3
Bases Specification 3/4.9.7	Crane Travel - Spent Fuel Storage Areas	B3/4 9-3

INDEX

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

<u>SECTION</u>	<u>PAGE</u>	
3/4.9.4	CONTAINMENT BUILDING PENETRATIONS.....	3/4 9-4
3/4.9.5	(THIS SPECIFICATION NUMBER IS NOT USED)	3/4 9-5
3/4.9.6	(THIS SPECIFICATION NUMBER IS NOT USED)	3/4 9-6
3/4.9.7	(THIS SPECIFICATION NUMBER IS NOT USED)	3/4 9-7
3/4.9.8	RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION	
	High Water Level	3/4 9-8
	Low Water Level	3/4 9-9
3/4.9.9	CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM.....	3/4 9-10
3/4.9.10	WATER LEVEL - REACTOR VESSEL	3/4 9-11
3/4.9.11	WATER LEVEL - STORAGE POOL	3/4 9-12
3/4.9.12	FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM	3/4 9-13
3/4.9.13	SPENT FUEL ASSEMBLY STORAGE	3/4 9-16
FIGURE 3.9-1	FUEL ASSEMBLY BURNUP VS. INITIAL ENRICHMENT FOR SPENT FUEL ASSEMBLY STORAGE	3/4 9-17
3/4.9.14	NEW FUEL ASSEMBLY STORAGE.....	3/4 9-18
3/4.10	<u>SPECIAL TEST EXCEPTIONS</u>	
3/4.10.1	SHUTDOWN MARGIN	3/4 10-1
3/4.10.2	GROUP HEIGHT, INSERTION, AND POWER DISTRIBUTION LIMITS	3/4 10-2
3/4.10.3	PHYSICS TESTS	3/4 10-3
3/4.10.4	REACTOR COOLANT LOOPS.....	3/4 10-4
3/4.10.5	POSITION INDICATION SYSTEM - SHUTDOWN	3/4 10-5
3/4.11	<u>RADIOACTIVE EFFLUENTS</u>	
3/4.11.1	<u>LIQUID EFFLUENTS</u>	
	Concentration.....	3/4 11-1
	Dose	3/4 11-2
	Liquid Radwaste Treatment System.....	3/4 11-3
	Liquid Holdup Tanks	3/4 11-4
3/4.11.2	<u>GASEOUS EFFLUENTS</u>	
	Dose Rate	3/4 11-5
	Dose - Noble Gases	3/4 11-6
	Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form.....	3/4 11-7
	Gaseous Radwaste Treatment System.....	3/4 11-8
	Explosive Gas Mixture - System.....	3/4 11-9
3/4.11.3	SOLID RADIOACTIVE WASTES	3/4 11-10
3/4.11.4	TOTAL DOSE	3/4 11-12
3/4.12	<u>RADIOLOGICAL ENVIRONMENTAL MONITORING</u>	
3/4.12.1	<u>MONITORING PROGRAM</u>	3/4 12-1

REFUELING OPERATIONS

3/4.9.5 (This specification number is not used.)

REFUELING OPERATIONS

3/4.9.6 (This specification number is not used.)

REFUELING OPERATIONS

3/4.9.7 (This specification number is not used.)

3/4.9 REFUELING OPERATIONS (Continued)

BASES

3/4.9.5 (THIS SPECIFICATION NUMBER IS NOT USED.)

3/4.9.6 (THIS SPECIFICATION NUMBER IS NOT USED.)

3/4.9.7 (THIS SPECIFICATION NUMBER IS NOT USED.)

3/4.9.8 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION

The requirement that at least one residual heat removal (RHR) loop be in operation ensures that: (1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor vessel below 140°F as required during the REFUELING MODE, and (2) sufficient coolant circulation is maintained through the core to minimize the effect of a boron dilution incident and prevent boron stratification.

The requirement to have two RHR loops OPERABLE when there is less than 23 feet of water above the reactor vessel flange ensures that a single failure of the operating RHR loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and at least 23 feet of water above the reactor pressure vessel flange, a large heat sink is available for core cooling. Thus, in the event of a failure of the operating RHR loop, adequate time is provided to initiate emergency procedures to cool the core.

Section IV

Determination Of Significant Hazards For The Proposed Change

IV. DETERMINATION OF SIGNIFICANT HAZARDS FOR THE PROPOSED CHANGE

License Amendment Request (LAR) 00-03 propose changes to the Seabrook Station Technical Specifications (TS) TS 3/4.9.5 "Communications," TS 3/4.9.6 "Refueling Machine," and TS 3/4.9.7 "Crane Travel - Spent Fuel Storage Areas."

The proposed changes will relocate the subject Technical Specifications to the Seabrook Station Technical Requirements Manual (SSTR). The SSTR is referenced in the Seabrook Station Updated Final Safety Analysis Report and is the implementing manual for the Technical Specifications Improvement Program. The proposed change is based on the NRC's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58 FR 39312), issued in July 1993, and the results of the NRC Staff review of WCAP-11618 as documented in a letter dated May 9, 1988 to R. A. Newton, Chairman of the Westinghouse Owners Group.

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to relocate Technical Specifications 3/4.9.5, 3/4.9.6 and 3/4.9.7 to the Technical Requirements Manual (TRM) are administrative in nature and do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, configuration of the facility or the manner in which it is operated. The proposed changes do not alter or prevent the ability or structures, systems, or components to perform their intended function to mitigate the consequences of an initiating event within the acceptance limits assumed in the Updated Final Safety Analysis Report.

The subject specifications relocated to the Technical Requirements Manual will continue to be administratively controlled. The TRM is a licensee-controlled document, which contains certain technical requirements and is the implementing manual for the Technical Specification Improvement Program. Changes to these requirements are reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7.1.i, and as outlined in the TRM.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not alter the design assumptions, conditions, or configuration of the facility or the manner in which the plant is operated. There are no changes to the source term or radiological release assumptions used in evaluating the radiological consequences in the Seabrook Station UFSAR. The proposed change has no adverse impact on component or system interactions. The proposed change will not adversely degrade the ability of systems, structures and components important to safety to perform their safety function nor change the response of any system, structure or component important to safety as described in the Seabrook Station Updated Final Safety Analysis Report (UFSAR). The proposed changes are administrative in nature and do not change the level of programmatic and procedural details of assuring operation of the facility in a safe manner. Since there are no changes to the design assumptions, conditions, configuration of the facility, or the manner in which the plant is operated and surveilled, the

proposed change does not create the possibility of a new or different kind of accident from any previously analyzed.

3. Involve a significant reduction in a margin of safety.

There is no adverse impact on equipment design or operation and there are no changes being made to the Technical Specification required safety limits or safety system settings that would adversely affect plant safety. The proposed change is administrative in nature and does not reduce the level of programmatic or procedural controls associated with the activities presently performed via Technical Specifications 3/4.9.5, 3/4.9.6 and 3/4.9.7.

Future changes to the subject technical requirements will be reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7, and as outlined in the Technical Requirements Manual. Specifically, all changes to the Technical Requirements Manual require a 10 CFR 50.59 safety evaluation and be reviewed and approved by the Station Operations Review Committee (SORC) prior to implementation.

Therefore, relocation of the requirements contained in Technical Specifications 3/4.9.5, 3/4.9.6 and 3/4.9.7 to the Technical Requirements Manual does not involve a significant reduction in the margin of safety provided in the existing specifications.

Based on the above evaluation, North Atlantic concludes that the proposed change does not constitute a significant hazard.

Sections V & VI

**Proposed Schedule for License Amendment Issuance and Effectiveness
and
Environmental Impact Assessment**

V. PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS

North Atlantic requests NRC Staff review of License Amendment Request 00-03 and issuance of a license amendment by September 15, 2000, becoming effective immediately and implemented within 60 days thereafter.

VI. ENVIRONMENTAL IMPACT ASSESSMENT

North Atlantic has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not involve a significant hazards consideration, nor increase the types and amounts of effluent that may be released off-site, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

ENCLOSURE 2 TO NYN-00028

North Atlantic Commitments Contained in NYN-00028

Description of Commitment

AR# 00003296-02 Upon approval of LAR 00-03, North Atlantic will revise the Technical Requirements Manual to relocate Technical Specifications 3/4.9.5, 3/4.9.6 and 3/4.9.7