North Atlantic

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The Northeast Utilities System

December 18, 2000

Docket No. 50-443

NYN-00106

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

Seabrook Station
License Amendment Request 00-06,
"Application For Technical Specification Revision For
Post Accident Systems Using The Consolidated Line Item Improvement Process"

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.4, North Atlantic Energy Service Corporation (North Atlantic) has enclosed herein License Amendment Request (LAR) 00-06 requesting an amendment to the technical specifications (TS) for Seabrook Station, Unit 1.

LAR 00-06 proposes a change to the Seabrook Station Technical Specification (TS) 6.7.6e, "Post-Accident Sampling," to relocate the programmatic aspects associated with maintaining the capability to obtain information about radionuclides existing post-accident to the Seabrook Station Technical Requirements (SSTR) manual.

In light of the recent NRC approved industry initiative justifying the elimination ofrequirements for a Post Accident Sampling System, North Atlantic has developed a Post Accident Assessment Program (PAAP). The PAAP provides the administrative controls to retain the capability to obtain information about radionuclides existing post-accident, thereby allowing for the removal of the specific Technical Specification administrative controls associated with post accident sampling, as detailed in Specification 6.7.6e, "Post-Accident Sampling." In essence, the PAAP embodies the licensee required actions outlined in WCAP-14986-A, Revision 2, "Westinghouse Owners Group Post Accident Sampling System Requirements: A Technical Basis," dated July 2000 (submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000 and May 22, 2000).

The PAAP resides in the SSTR manual as a pending Technical Requirement Program, which will become effective upon issuance of a License Amendment. The SSTR is the implementing manual for the Technical Specifications Improvement Program, as referenced in the Seabrook Station Updated Final Safety Analysis Report (UFSAR). The SSTR is a licensee-controlled document that contains certain technical requirements. 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 SSTR.

Removal of TS 6.7.6e requirements is consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced on October 31, 2000 in the Federal Register, Vol. 65, No. 211, as part of the Consolidated Line Item Improvement Process (CLIIP).

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The Station Operation Review Committee and the Nuclear Safety Audit Review Committee have reviewed LAR 00-06.

As discussed in the enclosed LAR Section I, the proposed change does not involve a significant hazard consideration pursuant to 10 CFR 50.92. A copy of this letter and the enclosed LAR has been forwarded to the New Hampshire State Liaison Officer pursuant to 10 CFR 50.91(b). North Atlantic requests NRC Staff review of LAR 00-06, and issuance of a license amendment by January 31, 2001 (see Section V enclosed).

North Atlantic has determined that LAR 00-06 meets the criteria of 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement (see Section III enclosed).

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

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.

Ted C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer

Enclosure

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

Mr. Woodbury P. Fogg, P.E., Director
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North Atlantic

SEABROOK STATION UNIT 1

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

License Amendment Request 00-06,
"Application For Technical Specification Revision For Post Accident Systems Using The Consolidated Line Item Improvement Process"

North Atlantic Energy Service Corporation pursuant to 10CFR50.90 submits License Amendment Request 00-06. The following information is enclosed in support of this License Amendment Request:

- Section I - Discussion, Assessment, Regulatory Analysis and Environmental Evaluation for Proposed Change
- Section II - Markup of Proposed Change
- Section III - Retype of Proposed Change
- Section IV - List of Regulatory Commitments
- Section V - Proposed Schedule for License Amendment Issuance and Effectiveness
- Section VI - Pending Technical Requirement Program

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 License Amendment Request 00-06 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
15th day of December, 2000

Notary Public

Ted C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer

SECTION I

DISCUSSION, ASSESSMENT, REGULATORY ANALYSIS AND ENVIRONMENTAL EVALUATION FOR PROPOSED CHANGE

A. DISCUSSION

A.1 Discussion

License Amendment Request (LAR) 00-06 proposes a change to the Seabrook Station Technical Specification (TS) 6.7.6e, "Post-Accident Sampling," to relocate the programmatic aspects associated with maintaining the capability to obtain information about radionuclides existing post-accident to the Seabrook Station Technical Requirements (SSTR) manual.

In light of the recent NRC-approved industry initiative justifying the elimination ofrequirements for a Post Accident Sampling System, North Atlantic has developed a Post Accident Assessment Program (PAAP). The PAAP provides the administrative controls to retain the capability to obtain information about radionuclides existing post-accident, thereby allowing for the removal of the specific Technical Specification administrative controls associated with post accident sampling, as detailed in Specification 6.7.6e, "Post-Accident Sampling." In essence, the PAAP embodies the licensee required actions outlined in WCAP-14986-A, Revision 2, "Westinghouse Owners Group Post Accident Sampling System Requirements: A Technical Basis," dated July 2000 (submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000 and May 22, 2000).

The PAAP resides in the SSTR manual as a pending Technical Requirement Program, which will become effective upon issuance of a License Amendment. The SSTR is the implementing manual for the Technical Specifications Improvement Program, as referenced in the Seabrook Station Updated Final Safety Analysis Report (UFSAR). The SSTR is a licensee-controlled document that contains certain technical requirements. 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 SSTR.

Removal of TS 6.7.6e requirements is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced on October 31, 2000 in the Federal Register, Vol. 65, No. 211, as part of the Consolidated Line Item Improvement Process (CLIIP).

A.2 Background

Westinghouse Owners Group (WOG) topical report WCAP-14986-A, Rev. 2,"Post Accident Sampling System Requirements: A Technical Basis," evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. WCAP-14986-A, Rev. 2, concluded that the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

B. ASSESSMENT

B.1 Applicability of Published Safety Evaluation

North Atlantic has reviewed the safety evaluation published on October 31, 2000 as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev.2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000 and May 22, 2000). North Atlantic has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Seabrook Station, Unit 1, and justify this amendment for the incorporation of the change to the Seabrook Station Technical Specifications.

B.2 Optional Changes and Variations

North Atlantic is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or the staff's model safety evaluation published on October 31, 2000.

The requirement for a post accident sampling program was included as part of the Seabrook Station original Operating License. This LAR deletes this requirement.

As described in the model safety evaluation published on October 31, 2000, the elimination of the TS and other regulatory requirements for PASS may result in additional changes to the TS and the associated Bases. The additional changes to TS may involve an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The additional changes to TS may also result in changes to the discussion in the Bases section for Post Accident Monitoring (PAM) Instrumentation that is associated with justification for allowing both hydrogen monitor channels to be out of service for a period of up to 72 hours. The changes suggested are associated with facilities that have converted to the improved technical specifications (ITS), e.g., NUREG-1431, Standard Technical Specifications – Westinghouse Plants. Seabrook Station has yet to convert to ITS. A review of the corresponding Seabrook Station TS 6.7.6a., Primary Coolant Sources Outside Containment, and Bases 3/4.3.3.6, Accident Monitoring Instrumentation, indicates that they do not require revision since they do not contain the detail in wording as described in the corresponding ITS version.

C. REGULATORY ANALYSIS

C.1 Proposed No Significant Hazards Determination

North Atlantic has reviewed the proposed no significant hazards consideration determination published on October 31, 2000 as part of the CLIIP. North Atlantic has concluded that the proposed determination presented in the notice is applicable to Seabrook Station and the determination is hereby incorporated, by reference to satisfy the requirements of 10 CFR 50.91(a).

C.2 Verifications and Commitments

As discussed in the notice of availability published in Federal Register on October 31, 2000 for this technical specification improvement, plant-specific verifications were performed as follows:

North Atlantic has developed the Post Accident Assessment Program[1] (PAAP) which provides the administrative controls to retain its current capability to obtain information about radionuclides existing post-accident at Seabrook Station. The PAAP ensures:

- The capability for classifying fuel damage events at the Alert level threshold of 300 microcuries per ml dose equivalent iodine.

- The development and maintenance of contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump (including pH), and containment atmosphere (including hydrogen).

- The capability to monitor radioactive iodines that have been released to offsite environs.

These capabilities are described in the PAAP and implemented in the emergency plan procedures. Maintaining the PAAP is considered a regulatory commitment and will become effective upon issuance of a License Amendment.

D. ENVIRONMENTAL EVALUATION

North Atlantic has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIIP. North Atlantic has concluded that the staff's findings presented in that evaluation are applicable to Seabrook station and the evaluation is hereby incorporated by reference for this application.

[1] See Section VI for pending Technical Requirement Program 5.6, Post Accident Assessment Program.

SECTION II

MARKUP OF THE PROPOSED CHANGE

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

The following Technical Specifications are included in the attached markup:

Technical Specification	Title	Page(s)
6.7.6e.	Post-Accident Sampling	6-14

PROCEDURES AND PROGRAMS

6.7.6 (Continued)

d. Backup Method for Determining Subcooling Margin

A program that will ensure the capability to accurately monitor the Reactor Coolant System subcooling margin. This program shall include the following:

1) Training of personnel, and

2) Procedures for monitoring.

NOT USED 1

e. Post-Accident Sampling

A program that will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1) Training of personnel,

2) Procedures for sampling and analysis, and

3) Provisions for maintenance of sampling and analysis equipment.

f. Accident Monitoring Instrumentation

A program which will ensure the capability to monitor plant variables and systems operating status during and following an accident. This program shall include those instruments provided to indicate system operating status and furnish information regarding the release of radioactive materials (Category 2 and 3 instrumentation as defined in Regulatory Guide 1.97, Revision 3)* and provide the following:

1) Preventive maintenance and periodic surveillance of instrumentation,

2) Preplanned operating procedures and backup instrumentation to be used if one or more monitoring instruments become inoperable, and

3) Administrative procedures for returning inoperable instruments to OPERABLE status as soon as practicable.

*Seabrook has taken exception to the categorization of instrumentation provided in Regulatory Guide 1.97, Revision 3. The Seabrook exceptions are provided in FSAR Table 7.5-1, which has been reviewed by the NRC staff in SER Supplement No. 5.

SECTION III

RETYPE OF THE PROPOSED CHANGE

The attached retype reflects 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 the Technical Specifications prior to issuance.

PROCEDURES AND PROGRAMS

6.7.6 (Continued)

d. Backup Method for Determining Subcooling Margin

A program that will ensure the capability to accurately monitor the Reactor Coolant System subcooling margin. This program shall include the following:

1) Training of personnel, and

2) Procedures for monitoring.

e. NOT USED

f. Accident Monitoring Instrumentation

A program which will ensure the capability to monitor plant variables and systems operating status during and following an accident. This program shall include those instruments provided to indicate system operating status and furnish information regarding the release of radioactive materials (Category 2 and 3 instrumentation as defined in Regulatory Guide 1.97, Revision 3)* and provide the following:

1) Preventive maintenance and periodic surveillance of instrumentation,

2) Preplanned operating procedures and backup instrumentation to be used if one or more monitoring instruments become inoperable, and

3) Administrative procedures for returning inoperable instruments to OPERABLE status as soon as practicable.

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SECTIONS IV & V

LIST OF REGULATORY COMMITMENTS
AND
PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS

IV. LIST OF REGULATORY COMMITMENTS

REGULATORY COMMITMENTS	Due Date/Event
North Atlantic has contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The requirement for contingency plans is a Technical Requirement described in the Post Accident Assessment Program (PAAP), as implemented through the Seabrook Station emergency plan procedures. The PAAP will be implemented with the implementation of the License Amendment. Establishment of contingency plans is considered a regulatory commitment.	Complete, to be implemented with amendment
The capability for classifying fuel damage events at the Alert level threshold has been established for Seabrook Station at radioactivity levels of 300 microcuries per ml dose equivalent iodine. This capability is a Technical Requirement described in the Post Accident Assessment Program (PAAP), as implemented through the Seabrook Station emergency plan procedures. The PAAP will be implemented with the implementation of the License Amendment. The capability for classifying fuel damage events is considered a regulatory commitment.	Complete, to be implemented with amendment
North Atlantic has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is a Technical Requirement described in the Post Accident Assessment Program (PAAP), as implemented through the Seabrook Station emergency plan procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete, to be implemented with amendment

V. PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS

North Atlantic requests NRC review of License Amendment Request 00-06, and issuance of a license amendment by January 31, 2001, having immediate effectiveness upon issuance of the License Amendment.

SECTION VI

PENDING TECHNICAL REQUIREMENT PROGRAM

Technical Requirement Program 5.6
Post Accident Assessment Program

This Technical Requirement Program establishes, implements and maintains the Post Accident Assessment Program (PAAP) at Seabrook Station. The PAAP ensures the capability to obtain information about the radionuclides existing post-accident. The information would allow those with decision-making responsibilities to plan for long-term recovery operations and limit the public's ingestion of radioactive materials. The program includes the following:

1) The capability for classifying fuel damage events at the Alert level threshold of 300 microcuries per ml dose equivalent iodine (DEI).

2) Contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump (including pH), and containment atmosphere (including hydrogen).

3) The capability to monitor radioactive iodines that have been released to offsite environs.

NOTE
Changes to the PAAP and associated implementing procedures will require the following determinations: 1. Whether the change decreases the effectiveness of the emergency plan in accordance with the provisions of 10 CFR 50.54(q) requirements, and 2. Assess the impact on Core Damage Assessment Methodology (CDAM).

References

1. License Amendment Request (LAR) 00-06, "Application For Technical Specification Improvement To Eliminate Requirements For Post Accident Systems Using The Consolidated Line Item Improvement Process".

2. WCAP-14986-A Revision 2, Westinghouse Owners Group Post Accident Sampling System Requirements: A Technical Basis, dated July 2000.

3. Industry/TSTF Standard Technical Specification Change Traveler, TSTF-366 (WOG-149, Rev. 0), Elimination of Requirements for a Post Accident Sampling System (PASS).