North Atlantic

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The Northeast Utilities System

August 2, 2001

Docket No. 50-443

NYN-01044
CR# 01-04772

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

Seabrook Station
License Amendment Request 01-04
"Reactor Containment Integrated Leakage Rate Test Interval Extension"

North Atlantic Energy Service Corporation (North Atlantic) is providing herein License Amendment Request (LAR) 01-04 in Enclosure 1 and a risk assessment of the proposed changes in Enclosure 2. LAR 01-04 is submitted pursuant to the requirements of 10 CFR 50.90 and 10 CFR 50.4.

On June 4, 1996, North Atlantic submitted LAR 96-05, which added Section 6.15 to the Seabrook Station Technical Specifications (TS). The purpose of LAR 96-05 was to implement a performance-based Containment Leakage Rate Test Program in accordance with Option B of 10 CFR 50, Appendix J at Seabrook Station. Option B is less prescriptive than Option A, utilizes risk-based insights, and allows the licensee flexibility to adopt cost-effective methods, including setting test intervals for implementing the safety objectives underlying the requirements of Appendix J. Option B is implemented utilizing NRC Regulatory Guide (RG) 1.163 "Performance-Based Containment Leak-Test Program." RG 1.163 specifies that NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J" provides methods acceptable to the NRC staff for complying with the provisions of Option B. LAR 96-05 was subsequently approved by the Nuclear Regulatory Commission (NRC) on February 24, 1997 and incorporated in Amendment 49 to the Facility Operating License NPF-86.

LAR 01-04 proposes a change to Seabrook Station Technical Specification (TS) 6.15 to permit a one time exception to the ten-year frequency for the Integrated Leakage Rate Test (ILRT) as specified by Section 9.2.3 of NEI 94-01. This exception will permit the existing ILRT frequency to be extended from ten-years to fifteen-years from the last test completed on October 30, 1992.

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This LAR represents a cost beneficial licensing change. The ILRT imposes a significant expense on Seabrook Station while the additional risk associated with extending the test interval is minimal. This LAR is similar to a License Amendment authorized by the NRC for the Indian Point Nuclear Generating Unit No. 3 dated April 7, 2001 (TAC No. MB0178).

The Station Operation Review Committee and the Nuclear Safety Audit Review Committee have reviewed LAR 01-04.

As discussed in Section IV of Enclosure 1, 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 01-04 and issuance of a license amendment by February 1, 2002 in order to plan activities for Refueling Outage 08, which is currently scheduled for May 2002 (see Section V of Enclosure 1).

North Atlantic has determined that LAR 01-04 meets the criteria of 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10) for a categorical exclusion from the requirements for an Environmental Impact Statement (see Section VI of Enclosure 1).

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

cc:

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Enclosure 1 to NYN-01044

North Atlantic

SEABROOK STATION UNIT 1

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

License Amendment Request 01-04,
"Reactor Containment Integrated Leakage Rate Test Interval Extension"

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 Changes**
- **Section II - Markup of Proposed Changes**
- **Section III - Retype of Proposed Changes**
- **Section IV - Determination of Significant Hazards for Proposed Changes**
- **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.

Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer

Sworn and Subscribed
before me this
2nd day of August, 2001

Notary Public

SECTION I

INTRODUCTION AND SAFETY ASSESSMENT FOR PROPOSED CHANGES

I. INTRODUCTION AND SAFETY ASSESSMENT OF PROPOSED CHANGES

A. Introduction

License Amendment Request (LAR) 01-04 proposes a change to the Seabrook Station Technical Specification (TS) 6.15 "Containment Leakage Rate Testing Program." TS 6.15 requires that the performance-based containment leakage rate test program be performed in accordance with Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak Test Program, dated September 1995," as modified by approved exceptions. RG 1.163 endorses Nuclear Electric Institute (NEI) Standard 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J." Specifically, Section 9.2.3 of NEI 94-01 states that "Type A [ILRT] testing shall be performed during a reactor shutdown at a frequency of at least once per 10 years based on acceptable performance history. Acceptable performance history is defined as two consecutive periodic Type A tests where the calculated performance leakage rate was less than $1.0L_a$."

LAR 01-04 proposes to revise TS 6.15 to take a one-time exception to the maximum ten-year frequency of the performance-based leakage rate-testing program for ILRTs as specified by NEI 94-01. The exception will permit the ILRT frequency to be extended from ten to fifteen-years from October 30, 1992 (the date of the last test). The last sentence of the first paragraph of TS 6.15 will be revised to read as follows: "This program shall be in accordance the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, dated September 1995," as modified by the following exception:

a. NEI 94-01 - 1995, Section 9.2.3: The first ILRT performed after October 30, 1992 shall be performed no later than October 29, 2007."

The next ILRT is scheduled for performance during Refueling Outage 8 (OR08), which is expected to occur in May 2002. Approval of this LAR will permit Seabrook Station to perform the next ILRT during a subsequent refueling outage prior to October 29, 2007. North Atlantic views this LAR as a cost beneficial licensing change. The performance of an ILRT imposes a significant expense upon Seabrook Station. As identified in Section 8.2.2 of NRC NUREG-1493 "Performance-Based Containment Leak-Test Program," estimates for test performance, critical path time and power replacement costs to complete an ILRT are $1,890,000.

Section V.B, "Implementation" of Option B, permits alternatives to the requirements of RG 1.163 without the need for an exemption to the regulations. This section states "The regulatory guide or other implementation document used by a licensee, or an applicant for an operating license, to develop a performance-based leakage-testing program must be included, by general reference, in the plant technical specifications. The submittal for technical specification revisions must contain justification, including supporting analyses, if the licensee chooses to deviate from methods approved by the Commission and endorsed in a regulatory guide." Therefore, this LAR does not require an exemption to Option B pursuant to the requirements of 10 CFR 50.12 "Specific Exemptions."

B. Safety Assessment of Proposed Changes

Compliance with 10 CFR Part 50, Appendix J provides assurance that the primary containment, including those systems and components, which penetrate the primary containment, do not exceed the leakage rate assumed in the plant analyses. The main purpose of the reactor containment system is to mitigate the consequences of potential accidents by minimizing the release of radionuclides to the environment to assure the health and safety of the public. Appendix J specifies containment leakage testing requirements, including the types of tests required to ensure the integrity of the containment system. The reactor containment leakage test program includes performance of an ILRT, also known as a Type A test. The ILRT measures the overall leakage rate of the primary containment. The ILRT is performed to verify the integrity of the containment system such that a release of products to the environment under postulated accident conditions does not exceed the limits in 10 CFR 100, "Reactor Site Criteria."

On February 4, 1992, the NRC published a notice in the Federal Register (57 FR 4166) discussing a planned initiative to begin eliminating requirements marginal to safety which impose a significant regulatory burden. Appendix J was considered for this initiative and the NRC staff undertook a study of possible changes to this regulation. The study examined the previous performance history of domestic containments and examined the effect on risk of a revision to the requirements of Appendix J. The results of this study were documented in NUREG-1493, "Performance-Based Containment Leak-Test Program."

NUREG-1493 concluded that reducing the frequency of ILRTs from three per ten years to one per twenty years would lead to an imperceptible increase in risk. The estimated increase in risk is very small because ILRTs identify only a few potential containment leakage paths that cannot be identified by local leakage rate [Type B and C] testing and the leaks that have been found by ILRTs have been only marginally above existing requirements. The study additionally concluded that of the approximately 180 ILRT reports considered, covering 110 individual reactors and approximately 770 years of operating history, only 5 ILRT failures were found which local leakage rate testing could not and did not detect. It was also noted that in the ILRT failures observed that were not detected by Type B and C testing, the actual leakage rates were very small and only marginally in excess of the current leak-tightness requirements for the subject plants.

As a result of the study, Appendix J was revised (60 FR 49495) to permit licensees to choose containment leakage testing under Option A "Prescriptive Requirements" or Option B "Performance Based Requirements." Option B is less prescriptive than Option A, utilizes risk-based insights, and allows the licensee flexibility to adopt cost-effective methods, including setting test intervals for implementing the safety objectives underlying the requirements of Appendix J. Option B identifies that specific guidance concerning a performance-based leakage-test program, acceptable leakage-rate test methods, procedures, and analyses that may be used to implement these requirements and criteria are provided in NRC Regulatory Guide (RG) 1.163 "Performance-Based Containment Leak-Test Program."

On June 4, 1996, North Atlantic submitted LAR 96-05, which added Section 6.15 to the Seabrook Station Technical Specifications (TS) to implement a performance-based Containment Leakage Rate Test Program in accordance with Option B. RG 1.163 specifies that NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," provides methods acceptable to the NRC staff for complying with the provisions of Option B. LAR 96-05 was subsequently approved by the NRC on February 24, 1997 and incorporated in Amendment 49 to the Facility Operating License (NPF-86).

As a result of License Amendment 49, North Atlantic has established a performance-based containment leakage rate test program for both ILRT and LLRT sub-programs. A ten-year frequency has been established for the ILRT based upon past testing results. The last two ILRTs were successfully completed on November 22, 1989 and October 30, 1992 respectively with an overall leakage rate less than 1.0 L_a. The pre-operational ILRT was also completed on March 19, 1986. The actual overall leakage rate results and the analysis methods used to determine containment leakage are identified as follows:

Test Date	Mass Point Method Leakage Rate** (%/day)	Total Time Method Leakage Rate*** (%/day)	Test Duration (Hours)	TS 6.15 Acceptance Criteria (%/day)
October 30, 1992	0.070	0.106	12	0.150
November 22, 1989	0.059	*	24	0.150
March 19, 1986	0.058	*	24	0.150

* The Total Time Analysis Method was not utilized during this test.

** The Mass Point Analysis Method is described Section 5.5.3 of ANSI/ANS-56.8-1994 "Containment System Leakage Testing Requirements."

*** The Total Time Analysis Method is described in Bechtel Topical Report (BN-TOP-1), Revision 1, dated November 1972, "Testing Criteria for Integrated Leakage Rate Testing of Primary Containment Structures for Nuclear Power Plants."

Previous ILRT testing confirms that the Seabrook Station containment structure leakage is low and represents minimal risk to increased leakage when compared to the TS 6.15 acceptance criterion of 0.150 %/day (1.0 L_a). The risk is minimized by continued local leakage rate testing (LLRT), continued performance of the general visual inspection required by RG 1.163, the maintenance rule inspection program, and the implementation of the containment inservice inspection program. The effectiveness of these programs is further discussed below.

In addition, a specific assessment of the risk impact associated with extending the ILRT frequency as proposed was performed. In performing this risk assessment North Atlantic followed the guidelines of NEI 94-01, NRC NUREG-1493, EPRI TR-104285 "Risk Impact

Assessment of Revised Containment Leak Rate Testing Intervals" and RG 1.174 "An Approach for using Probabilistic Risk Assessment in Risk-Informed Decisions On Plant-Specific Changes to the Licensing Basis." The results of this risk assessment were documented in Engineering Evaluation EE-01-008, Rev. 00, "Risk Impact of Extending the Frequency of Containment Integrated Leak Rate Testing from 10 Years to 16 Years." Even though this LAR only proposes a one-time extension of the ILRT to fifteen years, this evaluation is based upon a sixteen-year test frequency for added conservatism. This Seabrook Station specific evaluation concluded that a change in the ILRT frequency from one-in-ten years to one-in-sixteen years will have an extremely small change in population dose consequences (0.14%). Also, the change in the Large Early Release Frequency (LERF) is well below the RG 1.174 (1E-7) guideline for very small changes.

As a conservative measure, North Atlantic has also evaluated the change in Conditional Containment Failure Probability (ΔCCFP) as a result of the proposed extension of the ILRT frequency. The baseline Core Damage Frequency (CDF) as defined in the Seabrook Station Probabilistic Safety Study, 1999a (addenda) Update (including internal and external events) is 4.63E-5/yr. The ΔLERF (Section 3.2.4 of EE-01-008, Rev. 00 for the current one test in ten-years) is 2.32E-8/yr. The ΔLERF (Section 3.2.4 of EE-01-008, Rev. 00 for three tests per ten-years) is 4.89E-8/yr. Since ΔCCFP = ΔLERF/CDF, the ΔCCFP for the current one test in ten-years to the proposed one test in sixteen years is 0.0501%. ΔCCFP from the original frequency of three tests in ten-years to the proposed one test in sixteen years is 0.106%. A copy of EE-01-008, Rev. 00 is included in Enclosure 2 of this LAR.

LLRT Program

North Atlantic has a comprehensive LLRT [Type B and C] program in place to meet the requirements of Appendix J. The LLRT program is also performed under Option B of Appendix J. The Type B program tests electrical penetrations, the fuel transfer tube (bellows and flange), equipment hatch (flange o-ring and airlock), personnel air lock, two mechanical spare penetrations with flanged closures (o-rings), hydrogen analyzer trains, and two ventilation penetrations with flanged enclosures. The Type C program tests 39 penetrations. All except two of the valves associated with these penetrations are tested with pressure applied in the same direction as that when the valve would be required to perform its safety function (e.g., forward direction). The two valves that are tested in the reverse direction provide more conservative or equivalent leakage results.

A review of historical LLRT data below indicates that LLRT testing has been consistently maintained significantly below the combined leakage rate (0.60 L_a) for all penetrations and valves subject to Type B and C tests. In addition, Seabrook Station conservatively maintains an administrative leakage limit for each Type B and C tested containment penetration less than or equal to 0.05 L_a and a limit of 0.01 L_a for the containment on-line purge penetrations.

Year	Maximum Pathway Leakage*	Minimum Pathway Leakage*
2001	0.079 L_a	0.063 L_a
1999	0.094 L_a	0.074 L_a
1997	0.124 L_a	0.034 L_a
1995	0.126 L_a	0.054 L_a
1994	0.095 L_a	0.036 L_a
1992	0.110 L_a	0.036 L_a
1989	0.152 L_a	0.059 L_a
1986	0.146 L_a	0.099 L_a

* The Maximum and Minimum Pathway Leakage calculation methods are defined in Section 2 of ANSI/ANS-56.8-1994 "Containment System Leakage Testing Requirements."

Regulatory Guide 1.163 Containment Visual Examination

North Atlantic has a procedure in place to perform visual examination of the accessible interior and exterior surfaces of the containment system for structural problems. RG 1.163, Regulatory Position C.3 specifies that these examinations should be conducted prior to initiating a Type A [ILRT] and during two other outages before the next Type A test if the interval for the Type A test has been extended to 10-years, in order to allow for early uncovering of evidence of structural deterioration. These visual examinations have been completed prior to the 1986, 1989 and 1992 ILRTs with no significant defects noted. Additional visual examinations were conducted during 1995 and 1999 with no significant defects noted. Seabrook Station additionally conducts a general visual inspection of the concrete containment enclosure building to ensure its integrity as required by the TS 3.6.5.3 at the same interval as the primary containment structure. The secondary containment structure shields the primary containment structure from the effects of weather, thereby providing additional assurance of its integrity. The general visual inspection of the primary containment and the containment enclosure building will continue to be performed in accordance with the Containment Leakage Rate Testing Program.

Maintenance Rule Containment Building Inspections

North Atlantic has a program in place as required by 10 CFR 50.65 "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," to monitor the condition of structures within the scope of the rule on a three year frequency. Baseline structural inspections were conducted at Seabrook Station in 1996. An additional inspection was performed in 1999. No gross imperfections to structural steel or concrete were recorded during either inspection.

Containment Inservice Inspection Program Inspections

North Atlantic has developed a containment inservice inspection program as required by 10 CFR 50.55a(g)(6)(ii)(B). The containment inservice inspection program was developed pursuant to the requirements of Subsections IWE and IWL, of Section XI, of the 1995 Edition (including the 1996 Addenda) of the American Society of Mechanical Engineer's (ASME) Boiler and Pressure Vessel Code (Code). 10 CFR 50.55a(g)(6)(ii)(B) required an expedited examination of the accessible portions of primary containment liner, penetrations, selected pressure-retaining bolted connections, the moisture barrier at the liner to containment floor junction and outer concrete surfaces. The inspections were conducted during Refueling Outage 07 (OR07) and met the applicable requirements of the ASME Code.

North Atlantic submitted and obtained NRC approval (TAC No. MA8780 dated August 18, 2000) of two relief requests (CRR-1, Examination Requirements for Class MC Seals and Gaskets and CRR-2, Torque or Tension Test Requirements for Class MC) that rely on Appendix J leakage rate testing to satisfy containment inspection program requirements of Subsection IWE of the Code. However, the basis of NRC approval of subject relief requests is unaffected by the proposed extension of the ILRT interval. CRR-1 and CRR-2 both rely only on Type B local leakage rate tests to satisfy the alternative examination requirements.

Conclusion

Based upon past ILRT test performance, the strength of the LLRT program, the visual examinations of primary containment and enclosure building inspections performed as required by RG. 1.163, the ASME Code and the Maintenance Rule, combined with the low risk associated with extension of the ILRT test interval, North Atlantic concludes that the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard. The Determination of Significant Hazards for the proposed change to TS 6.15 is presented in Section IV of this submittal.

SECTION II

MARKUP OF PROPOSED CHANGE

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

The following Technical Specification change is included in the attached markup:

Technical Specification	Title	Page
6.15	Containment Leakage Rate Testing Program	6-24

6.15 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, dated September 1995," as modified by ~~approved exceptions.~~

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 49.6 psig.

The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.15% of primary containment air weight per day.

The provisions of SR 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of SR 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

Containment leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and Type C tests and $\leq 0.75\ L_a$ for Type A tests.

Overall air lock leakage rate acceptance criterion is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

Each containment 8-inch purge supply and exhaust isolation valve leakage rate acceptance criterion is $\leq 0.01\ L_a$ when tested at P_a.

the following exception:

a. NEI 94-01-1995, Section 9.2.3: The first ILRT performed after October 30, 1992 shall be performed no later than October 29, 2007.

SECTION III

RETYPE OF PROPOSED CHANGE

Refer to the attached retype of the proposed change to the Technical Specifications. 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 Technical Specifications prior to issuance.

6.15 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, dated September 1995," as modified by the following exception:

a. NEI 94-01 - 1995, Section 9.2.3: The first ILRT performed after October 30, 1992 shall be performed no later than October 29, 2007.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 49.6 psig.

The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.15% of primary containment air weight per day.

The provisions of SR 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of SR 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

Containment leakage rate acceptance criterion is $\leq$ 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq$ 0.60 L_a for the Type B and Type C tests and $\leq$ 0.75 L_a for Type A tests.

Overall air lock leakage rate acceptance criterion is $\leq$ 0.05 L_a when tested at $\geq P_a$.

Each containment 8-inch purge supply and exhaust isolation valve leakage rate acceptance criterion is $\leq$ 0.01 L_a when tested at P_a.

SECTION IV

DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGES

IV. DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGES

License Amendment Request (LAR) 01-04 proposes a change to the Seabrook Station Technical Specification (TS) 6.15, "Containment Leakage Rate Testing Program." LAR 01-04 proposes to revise TS 6.15 to take a one-time exception to the ten-year frequency of the performance-based leakage rate-testing program for ILRTs as required by NEI 94-01. The exception will permit the ILRT frequency to be extended to fifteen-years from October 30, 1992 (the date of the last test). The last sentence of the first paragraph of TS 6.15 will be revised to read as follows: "This program shall be in accordance the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, dated September 1995," as modified by the following exception:

a. NEI 94-01 - 1995, Section 9.2.3: The first ILRT performed after October 30, 1992 shall be performed no later than October 29, 2007."

In accordance with 10 CFR 50.92, North Atlantic has concluded that the proposed changes do not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed changes do not involve a SHC is as follows:

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

The proposed change to the Seabrook Station Technical Specifications does not involve a significant increase in the probability or consequences of an accident previously analyzed. The proposed revision to TS 6.15 adds a one-time extension to the current interval for the ILRT test. It is proposed that the current test interval be extended from ten-years to fifteen-years from the date of the last ILRT performed on October 30, 1992. The proposed extension cannot increase the probability of an accident previously evaluated since the test interval extension does not involve modification of the plant, nor a change to the operation of the plant that could initiate an accident. The proposed extension of the ILRT does not involve a significant increase in the consequences of an accident. The increase in risk is very small because ILRTs identify only a few potential leakage paths that cannot be identified by local leakage rate [Type B and C] testing, and the leaks that have been found by ILRTs have been only marginally above existing requirements. An analysis of the 144 ILRT results including 23 failures, found that no ILRT failures were due to a containment liner breach. NUREG-1493 concluded that reducing the ILRT testing frequency to one per twenty years would lead to an imperceptible increase in risk.

Therefore, it is concluded that the proposed change to TS 6.15 does not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. *The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.*

   The proposed change to Technical Specification 6.15 does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change adds a one-time extension to the current Integrated Leakage Rate Test frequency of ten-years to fifteen-years from the date of the last test. The proposed change cannot create the possibility of a new or different type of accident since there are no physical changes being made to the plant. Additionally, there are no changes to the operation of the plant that could introduce a new failure mode creating an accident or affecting the ability of the plant to mitigate an accident.

3. *The proposed changes do not involve a significant reduction in the margin of safety.*

   The proposed change does not involve a significant reduction in the margin of safety. The proposed revision to TS 6.15 adds a one-time extension to the current interval for the ILRT test. It is proposed that the current test interval be extended from ten-years to fifteen-years from the date of the last ILRT performed on October 30, 1992. As identified in NUREG-1493, a reduction in the ILRT frequency was found to lead to an imperceptible increase in risk. The estimated increase in risk is very small because ILRTs identify only a few potential leakage paths that cannot be identified by local leakage rate [Type B and C] testing, and the leaks that have been found by ILRTs have been only marginally above existing requirements. A Seabrook Station specific risk evaluation is consistent with the generic conclusions identified in NUREG-1493.

Based on the above evaluation, North Atlantic concludes that the proposed change to TS 6.15 does not constitute a significant hazard.

SECTIONS V AND 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 review of License Amendment Request 01-04, and issuance of a license amendment by February 1, 2002, having immediate effectiveness and implementation within 60 days.

VI. ENVIRONMENTAL IMPACT ASSESSMENT

North Atlantic has reviewed the proposed license amendment against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluent that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed changes meet the criteria delineated in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10) for a categorical exclusion from the requirements for an Environmental Impact Statement.

Enclosure 2 to NYN-01044