

May 2, 2002

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

SUBJECT: SEABROOK STATION, UNIT NO. 1 - ISSUANCE OF AMENDMENT RE:  
CHANGES TO CERTAIN TECHNICAL SPECIFICATIONS ASSOCIATED WITH  
RESPONSE TIME TESTING (TAC NO. MB3709)

Dear Mr. Feigenbaum:

The Commission has issued the enclosed Amendment No. 84 to Facility Operating License No. NPF-86 for the Seabrook Station, Unit No 1, in response to your application dated December 21, 2001, as supplemented March 25 and April 8, 2002.

The amendment revises Technical Specifications (TSs) Surveillance Requirements (SRs) 4.3.1.2 and 4.3.2.2 to allow verification in lieu of demonstration (i.e., testing/measurement) of response time associated with certain pressure sensors, differential pressure sensors, process protection racks, nuclear instrumentation, and logic systems.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

*/RA/*

Robert D. Starkey, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosures: 1. Amendment No. 84 to NPF-86  
2. Safety Evaluation

cc w/encls: See next page

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DISTRIBUTION:

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\*SE dated 4-22-02, with minor editorial changes  
\*\*see previous concurrence

Accession No.: ML021120232

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| DATE   | 05/02/02 | 05/02/02 | 04/25/02  | 04/22/02 | 04/24/02                | 05/02/02                 |

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NORTH ATLANTIC ENERGY SERVICE CORPORATION, ET AL.\*

DOCKET NO. 50-443

SEABROOK STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 84  
License No. NPF-86

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by the North Atlantic Energy Service Corporation, et al. (the licensee), dated December 21, 2001, as supplemented March 25 and April 8, 2002, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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\*North Atlantic Energy Service Corporation (NAESCO) is authorized to act as agent for the: North Atlantic Energy Corporation, Canal Electric Company, The Connecticut Light and Power Company, Great Bay Power Corporation, Hudson Light & Power Department, Massachusetts Municipal Wholesale Electric Company, Little Bay Power Corporation, New England Power Company, New Hampshire Electric Cooperative, Inc., Taunton Municipal Light Plant, The United Illuminating Company, and has exclusive responsibility and control over the physical construction, operation and maintenance of the facility.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-86 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 84, and the Environmental Protection Plan contained in Appendix B are incorporated into Facility License No. NPF-86. NAESCO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA VNurses for/*

James W. Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: May 2, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 84

FACILITY OPERATING LICENSE NO. NPF-86

DOCKET NO. 50-443

Replace the following pages of the Appendix A, Technical Specifications, with the attached revised pages as indicated. The revised pages are identified by amendment number and contain marginal lines indicating the area of change.

| <u>Remove</u> | <u>Insert</u> |
|---------------|---------------|
| 3/4 3-1       | 3/4 3-1       |
| 3/4 3-15      | 3/4 3-15      |
| B 3/4 3-2     | B 3/4 3-2     |
| B 3/4 3-2A    | B 3/4 3-2A    |
| - - -         | B 3/4 3-2B    |
| - - -         | B 3/4 3-2C    |
| - - -         | B 3/4 3-2D    |

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 84 TO FACILITY OPERATING LICENSE NO. NPF-86  
NORTH ATLANTIC ENERGY SERVICE CORPORATION

SEABROOK STATION, UNIT NO. 1

DOCKET NO. 50-443

## 1.0 INTRODUCTION

By letter dated December 21, 2001, as supplemented March 25 and April 8, 2002, the North Atlantic Energy Service Corporation (the licensee) submitted a request for changes to the Seabrook Station, Unit No. 1, Technical Specifications (TSs). The requested changes would revise TSs Surveillance Requirements (SRs) 4.3.1.2 and 4.3.2.2 to allow verification in lieu of demonstration (i.e., testing/measurement) of response time associated with certain pressure sensors, differential pressure sensors, process protection racks, nuclear instrumentation, and logic systems. The supplements dated March 25 and April 8, 2002, provided additional information that clarified the application, did not expand the scope of the application as originally published, and did not change the staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on January 22, 2002 (67 FR 2925).

The proposed changes will eliminate the periodic requirement to physically measure Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) channel response times and allow response times to be verified by summing allocated times for certain sensors, the process protection system, the nuclear instrumentation system, and the logic system. Those devices not exempted from response time testing (RTT) will continue to be periodically tested.

## 2.0 BACKGROUND

Most operating nuclear power plants TSs require licensees to periodically perform response time testing (RTT) for selected instrument channels in the RTS and the ESFAS. The intent of these tests is to ensure that changes in response time of instrumentation beyond the limits assumed in safety analyses are detected and combined with instrument calibrations, to ensure that the instrumentation is operating correctly. The changes proposed by the licensee would afford operational flexibility by eliminating the periodic requirement for RTT of certain components and systems.

The requirement for periodic testing of reactor trip systems is established in Section 50.55a, "Codes and Standards," of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50. Section 50.55a(h)(2) states that: "For nuclear power plants with construction permits issued after January 1, 1971, but before May 13, 1999, protection systems must meet the requirements stated in either IEEE Std. 279 or IEEE Std. 603-1991, and the correction sheet dated January 30, 1995." In addition, 10 CFR 50.36(c)(2)(ii)(A) requires a TS limiting condition for operation (LCO) for "installed instrumentation that is used to detect, and indicate in the

control room, a significant abnormal degradation of the reactor coolant pressure boundary.” Section 50.36(c)(3), “Surveillance Requirements,” also states that: “Surveillance requirements are requirements related to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within the safety limits, and that the limiting conditions of operation will be met.” In 1975, the NRC implemented a program that made RTT a requirement of the TSs.

The basis for elimination of RTT is contained in IEEE 338, Section 6.3.4, paragraph 3 which states: “Response time testing of all safety-related equipment is not required if, in lieu of response time testing, the response time of the safety equipment is verified by functional testing, calibration checks or other tests or both. This is acceptable if it can be demonstrated that changes in response time beyond acceptable limits are accompanied by changes in performance characteristics which are detectable during routine periodic tests.” This IEEE standard was endorsed by Regulatory Guide 1.118, “Periodic Testing of Electric Power and Protection Systems.”

In 1991, the Electric Power Research Institute (EPRI) issued a report, NP-7243, “Investigation of Response Time Testing Requirements.” That report included a failure mode and effects analysis (FMEA) of certain sensors as well as an evaluation of response time test data. The report determined that for these sensors, any failure that will affect the response time characteristic of the sensors will also affect the calibration and other routine surveillance, and therefore, a separate response time test is not required to demonstrate response time assumptions used in the Final Safety Analysis Report (FSAR).

In September, 1995, the Nuclear Regulatory Commission (NRC) staff approved a Westinghouse Owners Group (WOG) topical report WCAP-13632-P, Revision 2, “Elimination of Pressure Sensor Response Time Testing Requirements.” The staff accepted WCAP-13632-P, Revision 2, for reference in license amendment applications for all Westinghouse pressurized water reactors, with specified conditions, in a safety evaluation report (SER) dated September 5, 1995. In January 1996, Westinghouse issued WCAP-13632-P-A, Revision 2, which included the NRC staff SER.

In October 1998, the NRC staff approved a WOG topical report WCAP-14036-P, Revision 1, “Elimination of Periodic Protection Channel Response Time Tests.” The staff accepted WCAP-14036-P, Revision 1, for reference in license amendment applications for all Westinghouse pressurized water reactors, with specified conditions, in an SER dated October 5, 1998, and a correction stated in a letter to the WOG dated November 3, 1998. Westinghouse subsequently issued WCAP-14036-P-A, Revision 1, which included the NRC staff SER.

On April 3, 2002, the NRC issued an amendment to the Seabrook Station license which approved the addition of the following words to the TSs Definitions for “Reactor Trip System (RTS) Response Time” and “Engineered Safety Feature (ESF) Response Time.”

In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC.

### 3.0 EVALUATION

#### 3.1 Description of Proposed Changes

The proposed changes to the Seabrook Station TS SRs 4.3.1.2 and 4.3.2.2 will replace the words “demonstrated,” “test,” and “tested” with the words “verified” and “verification.” The basis for the proposed changes will be incorporated into TS Bases Sections B 3/4.3.1 and B 3/4.3.2.

The proposed wording for TS 3/4.3.1, “Reactor Trip System (RTS) Instrumentation” SURVEILLANCE REQUIREMENTS 4.3.1.2 is as follows:

THE REACTOR TRIP SYSTEM RESPONSE TIME of each Reactor Trip function shall be verified to be within its limit at least once per 18 months. Each verification shall include at least one train such that both trains are verified at least once per 36 months and one channel per function such that all channels are verified at least once every N times 18 months where N is the total number of redundant channels in a specific Reactor Trip function as shown in the “Total No. of Channels” column of Table 3.3-1.

The NRC staff verified that the proposed wording is consistent with the wording in topical report WCAP-14036-P-A.

The proposed wording for ESFAS SURVEILLANCE REQUIREMENTS 4.3.2.2 is as follows:

THE ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be verified to be within the limit at least once per 18 months. Each verification shall include at least one train such that both trains are verified at least once per 36 months and one channel per function such that all channels are verified at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the “Total No. of Channels” column of Table 3.3-3.

The NRC staff verified that the proposed wording is consistent with the wording in topical report WCAP-14036-P-A.

#### 3.2 WCAP-13632-P-A

WCAP-13632-P-A, Revision 2, provides the technical justification for deletion of periodic response time testing of selected pressure sensing instruments. WCAP-13632-P-A uses the methods contained in EPRI Report NP-7243, Revision 1, “Investigation of Response Time Testing Requirements.” The EPRI report justifies the elimination of periodic response time testing based on FMEA that shows that other routine tests, such as a calibration test component, will detect degradation that impacts pressure sensor response time. The report concludes that sensor RTT is redundant to other TS SRs such as sensor calibrations. The EPRI report only applies to those specific sensors included in the FMEA.

To address other sensors installed in Westinghouse-designed plants, Westinghouse performed a similarity analysis to sensors in EPRI Report NP-7243, Revision 1, or an FMEA to provide justification for elimination of periodic response time testing requirements for those sensors not addressed in the EPRI report.

The SER approving WCAP-13632-P-A, Revision 2, stated that licensees submitting plant-specific license amendment (TS change) requests must commit to certain actions. The SER actions, and the Seabrook commitments are shown below.

- (a) Perform a hydraulic RTT prior to installation of a new transmitter/switch or following refurbishment of the transmitter/switch (e.g., sensor cell or variable damping components) to determine an initial sensor-specific response time value.

The licensee stated in their application that the requirement to perform hydraulic response time tests prior to installation of a new transmitter/switch or following refurbishment of the transmitter/switch (e.g., sensor cell or variable damping components) to determine an initial sensor-specific response time value will be incorporated into applicable plant documentation.

- (b) For transmitters and switches that use capillary tubes, perform an RTT after initial installation and after any maintenance or modification activity that could damage the capillary tubes.

The licensee stated in their application that the requirement to perform an RTT for transmitters and switches that use capillary tubes after initial installation and after any maintenance or modification activity that could damage the capillary tubes will be incorporated into applicable plant documentation.

- (c) If variable damping is used, implement a method to assure that the potentiometer is at the required setting and cannot be inadvertently changed or perform hydraulic RTT of the sensor following each calibration.

The licensee stated in their application that Seabrook Station currently has no pressure transmitters with variable damping installed in any Reactor Protection System (RPS) or ESFAS application for which RTT is required; therefore, no Seabrook Station procedure changes or enhanced administrative controls are required. The licensee further stated that if, in the future, a pressure transmitter with variable damping capability is used, then they will implement procedure changes and/or establish appropriate administrative controls to ensure the variable damping potentiometer cannot be inadvertently changed.

- (d) Perform periodic drift monitoring of all Model 1151, 1152, 1153, and 1154 Rosemount pressure and differential pressure transmitters, for which RTT elimination is proposed, in accordance with the guidance contained in Rosemount Technical Bulletin No. 4 and continue to remain in full compliance with any prior commitments to NRC Bulletin 90-01, Loss of Fill-Oil in Transmitters Manufactured by Rosemount, Supplement 1. As an alternative to performing periodic drift monitoring of Rosemount transmitters, licensees may complete the following actions: (1) ensure that operators and technicians are aware of the Rosemount transmitter loss of fill-oil issue and make provisions to ensure that technicians monitor for sensor response time degradation during the performance of calibrations and functional tests of these transmitters, and (2) review and revise surveillance testing procedures, if necessary, to ensure that calibrations are being performed using equipment designed to provide a step function or fast ramp in the process variable and that calibrations and functional tests are being performed in a manner that allows simultaneous monitoring of both the input and output response of the transmitter under test, thus allowing, with reasonable assurance, the recognition of significant response time degradation.

The licensee stated in their application that they are currently performing drift monitoring for Model 1153 and 1154 Rosemount pressure and differential pressure transmitters in accordance with the guidance contained in Rosemount Technical Bulletin No. 4 and that they are in full compliance with any prior commitments to NRC Bulletin 90-01, Supplement 1. The licensee further stated that currently no Model 1151 and 1152 Rosemount pressure and differential pressure transmitters are installed at Seabrook Station.

The NRC staff verified that the preceding licensee commitments were those required by the SER which approved WCAP-13632, Revision 2.

### 3.3 WCAP-14036-P-A

Topical report WCAP-14036-P-A describes the WOG program to demonstrate that periodic RTT requirements for selected protection channel equipment in the RTS and ESFAS could be eliminated. Upon eliminating the RTT requirements, the total RTS or ESFAS channel response time would be verified by summing a bounding response time with the measured response time of the remainder of the channel.

The licensee stated that the FMEA presented in WCAP-14036-P-A, Revision 2, is applicable to the following Seabrook Station systems:

- Process Protection System                      Westinghouse/7300
- Nuclear Instrumentation System              Westinghouse/Nuclear Instrumentation System (NIS)
- Logic System    Westinghouse/Solid State Protection System (SSPS)

The justification basis for eliminating periodic response time testing for these systems, as discussed in WCAP-14036-P-A, is as follows:

- (1) That any failure that significantly degrades response time will be detectable during surveillance testing such as calibration and channel checks, or
- (2) The total response time allocation will be modified to include an allowance for those failures that are not specifically detectable by these tests.

The SER approving WCAP-14036-P-A, Revision 2, stated that licensees submitting plant-specific license amendment (TS change) requests must verify that the FMEA performed by the WOG is applicable to the equipment actually installed in the licensee's facility, and that the analysis is valid for the versions of the boards used in the protection system. The NRC staff verified that the licensee confirmed in their application that the FMEA presented in WCAP-14036-P-A is applicable to, and valid for, the equipment actually installed at Seabrook Station. The licensee determined that with the use of the generic response times, the overall plant-specific system response times remain within the Seabrook Station safety analysis limits. Therefore, the licensee will use allocations for system response times either from the bounding criteria in WCAP-14036-P-A or from the summation of individual components within a specific channel, as appropriate.

The following tables, Table I.B-1 for the RTS and Table I.B-2 for the ESFAS, delineate the Seabrook Station response time allocations. The vendor supplied the table values for the sensors. The NRC staff previously approved the table values for the process and other equipment in the SER approving WCAP-14036-P-A.

TABLE I.B-1  
Reactor Trip System (RTS) Response Time Allocations

| <u>RTS Function</u>                           | <u>Sensor</u>              |          | <u>7300 Process Cabinet</u><br>(Note 7) |        | <u>SSPS Input Relay/Logic</u><br>(Note 1) |
|---|----------------------------|----------|---|--------|---|
|   | Type                       | (sec.)   | String                                  | (sec.) | (Sec.)                                    |
| NIS PR High & Low SP                          | (Note 2)                   | (Note 2) | NIS cabinet<br>(Note 3)                 | 0.065  | 0.020/0.01                                |
| NIS PR High Positive Rate                     | (Note 2)                   | (Note 2) | NIS cabinet<br>(Note 4)                 | 0.300  | 0.020/0.01                                |
| NIS PR High Negative Rate                     | (Note 2)                   | (Note 2) | NIS cabinet<br>(Note 3)                 | 0.200  | 0.020/0.01                                |
| $OT_{\Delta T}$ , $OP_{\Delta T}$ / $T_{avg}$ | (Note 5)                   | (Note 5) | NRT+NSA+NSA+NSA+NAL                     | 0.400  | 0.020/0.01                                |
| Pressurizer Pressure Low & High               | Rosemount 1154GP9          | 0.200    | NLP+NAL                                 | 0.100  | 0.020/0.01                                |
| Reactor Coolant Flow Low                      | Veritrak76D P1&Tobar3 2DP2 | 0.400    | NLP+NAL                                 | 0.100  | 0.020/0.01                                |
| S/G Level Low-Low                             | Rosemount 1154DP4          | 0.500    | NLP+NAL                                 | 0.100  | 0.020/0.01                                |
| RCP Undervoltage                              | (Note 6)                   | (Note 6) | --                                      |        | --  |
| RCP Underfrequency                            | (Note 6)                   | (Note 6) | --                                      |        | --  |

Notes:

1. For the Input Relays, the response time allocation is 0.200 sec. for normally energized relays.
2. Nuclear Instrumentation detectors are not response time tested.
3. Westinghouse Nuclear Instrumentation Cabinet time allocation from WCAP-14036-P-A, Revision 1
4. Westinghouse Nuclear Instrumentation Cabinet time allocation from Seabrook Station Plant Data.
5. Periodic response time testing of the Resistance Temperature Detectors (RDTs) will continue.
6. Periodic response time testing of these functions will continue.
7. Listed response times do not provide an allowance for lead/lag cards when installed in 7300 Process Cabinet strings.

TABLE I.B-2  
 Engineered Safety Features Actuation System (ESFAS) Response Time Allocations

| <u>ESFAS Function</u>                      | <u>Sensor</u>  |        | <u>7300Process Cabinet (Note 3)</u> |        | <u>SSPS Input Relay/Logic (Note 1)</u> |
|--|--|--------|-------------------------------------|--------|--|
|  | Type   | (Sec.) |                                     | (Sec.) |  |
| Containment Pressure HI-1                  | Barton 752   | 0.400  | NLP&NAL                             | 0.100  | 0.020/0.01                             |
| Pressurizer Pressure Low                   | Rosemount 1154GP9                                    | 0.200  | NLP&NAL                             | 0.100  | 0.020/0.01                             |
| Steam Pressure Low                         | Veritrak 76PG1<br>Tobar 32PA2<br>Rosemount 1153GB9   | 0.200  | NLP&NAL                             | 0.100  | 0.020/0.01                             |
| Containment Pressure HI-3                  | Barton 752   | 0.400  | NLP&NAL                             | 0.100  | 0.026/0.01                             |
| Containment Pressure HI-2                  | Barton 752   | 0.400  | NLP&NAL                             | 0.100  | 0.020/0.01                             |
| Steam Line Hi Negative Rate                | Veritrak 76PG1,<br>Tobar 32PA2,<br>Rosemount 1153GB9 | 0.200  | NLP&NAL                             | 0.100  | 0.020/0.01                             |
| S/G Level HI-HI                            | Rosemount 1154DP4                                    | 0.500  | NLP&NAL                             | 0.100  | 0.020/0.01                             |
| S/G Level Low-Low                          | Rosemount 1154DP4                                    | 0.500  | NLP&NAL                             | 0.100  | 0.020/0.01                             |
| Emergency Feedwater Flow                   | Rosemount 1153DB5                                    | 0.200  | (Note 2)                            |        | --                                     |
| RWST Level Low-Low                         | Veritrak 76DP1                                       | 0.400  | NLP&NAL                             | 0.100  | 0.026/0.01                             |
| LOP Diesel Gen Start                       | (Note 2)   | Note2  | --                                  |        | --                                     |
| CBA Actuation on Control Room HI Radiation | (Note 2)   | Note2  | --                                  |        | --                                     |

Notes:

1. For the Input Relays, the response time allocation is 0.020 sec. for normally energized relays, and 0.026 sec. for normally de-energized relays.
2. Periodic response time testing of these functions will continue.
3. Listed response times do not provide an allowance for lead/lag cards when installed in 7300 Process Cabinet strings.

The staff compared the above allocated response times with the SERs of topical reports WCAP-13632-P-A and WCAP-14036-P-A. The staff verified that the Seabrook Station allocated response times are either from the bounding criteria in the topical reports or from the summation of individual components within a specific channel, as appropriate and, therefore, are acceptable.

### 3.4 Conclusion

On the basis of the preceding review, the NRC staff concluded that the licensee has implemented the provisions of the generic topical reports, WCAP-13632-P-A, Revision 2, and WCAP-14036-P-A, Revision 1, and satisfied the applicable plant-specific conditions shown in the NRC staff's SERs on those topical reports. The proposed wording is also consistent with the wording in NUREG-1431. Therefore, the staff concludes that the proposed TS modifications for selected instrument RTT elimination are acceptable.

### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Hampshire and Massachusetts State officials were notified of the proposed issuance of the amendment. The State officials had no comments.

### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (67 FR 2925). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: May 2, 2002

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