



**North  
Atlantic**

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The Northeast Utilities System

June 20, 2002

Docket No. 50-443

NYN-02061

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

Seabrook Station  
Response to NRC Questions Regarding ISI Program Relief Request IR-12

On July 27, 2001, North Atlantic Energy Service Corporation (North Atlantic) submitted by letter (NYN-01054) five relief requests, associated with the First Ten-Year Interval Inservice Inspection (ISI) Program requirements as specified within Section XI of the 1983 Edition through the Summer 1983 Addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. North Atlantic implemented its Second Ten-Year Interval ISI Program on August 18, 2000. Upon completion of the First Ten-Year Interval ISI Program, North Atlantic determined that certain ASME Code requirements were impractical to meet.

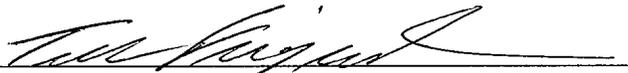
Based upon the NRC review of the subject relief requests, a telephone conference was held on June 13, 2002 to enable North Atlantic to provide supplemental information to assist the NRC evaluation of Relief Request IR-12. IR-12 requested relief from surface examination requirements of four pressurizer welded attachments and visual examination requirements for the associated supports. The North Atlantic responses to the NRC questions are provided in Enclosure 1 of this letter. A copy of Foreign Print 50586, which provides details of the subject pressurizer supports is additionally provided in Enclosure 2.

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Should you require further information regarding this matter, please contact Mr. James M. Peschel, Manager - Regulatory Programs, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.



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Ted C. Feigenbaum  
Executive Vice President  
and Chief Nuclear Officer

cc:

H. J. Miller, NRC Region I Administrator  
R. D. Starkey, NRC Project Manager, Project Directorate I-2  
G.T. Dentel, NRC Senior Resident Inspector

**Enclosure 1 to NYN-02061**

With reference to the submittal dated July 27, 2001, the following information regarding the Category F-A, Item No. F1.40 portion of Relief Request IR-12 is provided:

Question 1: Please provide a representative drawing of the pressurizer/pressurizer lugs and the associated support(s).

Response: Seabrook Station Foreign Print 50586 is provided in enclosure 2 of this letter.

Question 2: Please identify the associated support (component identification), identify the type and number of supports.

Response: Support Identification: RC PRESSURIZER SUPTS  
Type: Plate and Shell  
Quantity: 4

Question 3: The VT-3 examination of the supports is to identify conditions such as clearances, settings, physical displacements, loose or missing parts, debris, corrosion, wear, erosion or loss of integrity. The licensee proposes not to examine these supports but provides no justification that there is reasonable assurance of structural integrity.

- a. Are similar supports in a similar environment being examined?
- b. What is the justification that the supports have maintained proper clearances, settings, displacements, and the overall conditions are acceptable?

Responses: 3a. There are no other similar supports in a similar environment. These supports are in a unique location.

- 3b. The overall condition and clearances of these supports is unknown. These supports provide limitations on pressurizer vessel rotational movement. There has been no indication that unwanted/unexpected rotational movement has occurred. North Atlantic considers these supports inaccessible and as such would be classified similar to supports exempt from examination as defined in IWF-1230, 1992 Edition (earlier editions stated that IWF-1230 is in course of preparation).

Question 4: IWA-2213(c) states that the visual examination can be done remotely to verify the structural integrity. Please address whether a remote examination was considered (insulation).

Response: North Atlantic has considered the possibility of performing a remote examination using a pole camera. However, the subject supports are located approximately 26 feet below the top of the pressurizer cubicle. Area and height limitations within the cubicle prevent use of a pole camera even when using a segmented pole. North Atlantic has also considered performing a remote examination from below the subject supports but this option was not viable due to a ring of ventilation duct that encircles the pressurizer preventing access.

**Enclosure 2 to NYN02061**

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**REV. 11**

**"RCS WQUIPMENT  
PRESSURIZER SUPPORTS"  
WITHIN THIS PACKAGE...OR,  
BY SEARCHING USING THE  
DOCUMENT/REPORT NUMBER  
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**NOTE: Because of this page's large file size, it may be more convenient to copy the file to a local drive and use the Imaging (Wang) viewer, which can be accessed from the Programs/Accessories menu.**

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