

# New Hampshire Yankee

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Senior Vice President and  
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NYN- 90007

January 9, 1990

United States Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Attention: Mr. William T. Russell, Regional Administrator

Reference: Facility Operating License NPF-67, Docket No. 50-443

Subject: Request for Discretionary Enforcement

Gentlemen:

New Hampshire Yankee will be performing post-modification testing on the Seabrook Station steam turbine-driven emergency feedwater (EFW) pump during preparation for power ascension testing. The post-modification testing to be performed for this EFW pump is described in Enclosure 1.

Seabrook Station Technical Specifications allow entry into MODE 3 to perform surveillance testing for the steam turbine-driven EFW pump, and allow this pump to be inoperable for up to 72 hours. New Hampshire Yankee intends to perform a more comprehensive pre-operational test (STP-121) rather than the normal post-modification test in order to demonstrate total system operability. New Hampshire Yankee hereby requests that discretionary enforcement be applied to this Technical Specification to allow the unit to remain in MODE 3 to facilitate the performance of the required testing. Specifically, New Hampshire Yankee requests that discretionary enforcement be applied for two to three days, if necessary, subsequent to the expiration of the 72 hour time restriction in Technical Specification 3.7.1.2, to facilitate a carefully controlled, high quality test. New Hampshire Yankee will promptly inform the NRC both upon initiation and expiration of the discretionary enforcement period.

The performance of this testing in MODE 3 does not create the possibility of any adverse safety consequences. During this testing, the unit will be subcritical with negligible decay heat. Although the steam turbine-driven EFW pump is considered to be INOPERABLE during the period of time it is being tested, the proposed change applies only to stable shutdown conditions where the two motor-driven auxiliary feedwater pumps (the startup feed pump and the motor-driven EFW pump), are OPERABLE and the plant is preparing for a startup with negligible decay heat, rather than performing a cooldown under emergency conditions. Furthermore, the operability of the two motor driven pumps is ensured through the mode change administrative controls, Procedure OP 11.4, "Mode Change Notice". Prior to authorizing

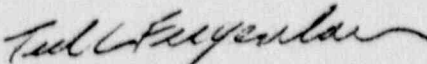
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entry into Mode 3, the Shift Superintendent must verify the completion of the necessary surveillance requirements, including those applicable to the motor driven EFW and the startup feedwater pumps.

If you have questions regarding this request, please contact Mr. Terry L. Harpster, Director of Licensing Services, at (603) 474-9521, extension 2765.

Very truly yours,

  
Ted C. Feigenbaum

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

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BACKGROUND

New Hampshire Yankee has modified the Seabrook Station Auxiliary Feedwater System to resolve concerns regarding valve leakage and reliability for three valves in the steam supply system for the steam turbine-driven emergency feedwater (EFW) pump. This modification includes the replacement of the previously installed 4-inch Hammel-Dahl valves with 4-inch Masonellan valves utilizing 3-inch internal trim for smoother flow control. This valve configuration will ensure positive actuation of the valves. Additionally, the Woodward governor for the turbine has been modified by replacing the acceleration bushing in order to smooth turbine acceleration on demand. New Hampshire Yankee intends to perform comprehensive pre-operational testing on the steam turbine-driven EFW pump prior to entry into MODE 2.

DESCRIPTION OF TEST

The testing to be performed involves six starts of the steam turbine-driven EFW pump. The first start will be a manual start of the pump to verify the proper functioning of the modified governor. Following this start, five cold starts of the system will be performed. After each start, the piping will be allowed to cool until the temperature at a monitoring point is less than 140° Fahrenheit (approximately six hours). The testing will be performed in the following sequence: 1) actuate both steam supply trains, 2) actuate the A steam supply train only, 3) actuate the B steam supply train only, 4) actuate both steam supply trains, and 5) repeat actuation of both steam supply trains. During the performance of this test, it is anticipated that minor changes, such as adjustment of valve timing, may be required.

New Hampshire Yankee believes that the performance of this comprehensive testing will result in a level of assurance of system operability equivalent to or greater than that achieved by previous system testing (ST-53 and STP-101).

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