PSNH PUBLIC SERVICE
Company of New Hampshire

SEABROOK STATION
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November 9, 1982

SBN-359
T.F. B 7.1.2

United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. George W. Knighton, Chief
Licensing Branch 3
Division of Licensing

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444
(b) USNRC Letter, dated August 13, 1982, "Draft Safety Evaluation Report (SER) for Seabrook Station", T. M. Novack to W. C. Tallman

Subject: Draft SER Section 2.5.5.3

Dear Sir:

The following comment appears in the Draft SER Section 2.5.5.3, which was forwarded in Reference (b):

> "To further assure the safe functioning of the revetment slopes during the life of the plant, the staff requires that the applicant commit to developing an appropriate inservice inspection and surveillance program for the revetments and to include the revetments as items to be inspected under the purview of USNRC Regulatory Guide 1.127, 'Inspection of Water Control Structures Associated with Nuclear Power Plants'."

In response to the above comment, we will revise FSAR Section 1.8, regarding our position on USNRC Regulatory Guide 1.127 (Revision 1, 3/78) as indicated on the attached annotated FSAR page (1.8-48) to include an appropriate inservice inspection and surveillance program for the flood protective structures.

The revision to FSAR Section 1.8 will be included in OL Application Amendment 48.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

J. DeVincentis
Project Manager

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Attachment

This position was accepted by the NRC via the RESAR 414 Safety Evaluation Report.

Regulatory Guide 1.125 (Rev. 1, 10/78)	Physical Models for Design and Operation of Hydraulic Structures and Systems for Nuclear Power Plants

Seabrook does not have any safety-related hydraulic structures which directly interface with surface waters.

Some of the types of physical modeling studies included in Regulatory Guide 1.125, Rev. 1, were, however, used in the design and operation of non-safety related hydraulic structures and systems of the plant. A number of these studies were discussed with the NRC Staff at the testing facilities. Results of these studies have been transmitted to the NRC staff.

The physical modeling studies are further discussed in Section 3.4 of the environmental report.

Regulatory Guide 1.126 (Rev. 1, 3/78)	An Acceptable Model and Related Statistical Methods for the Analysis of Fuel Densification

The fuel densification model presented in Reference (11), which has been approved by the NRC, has been utilized.

Regulatory Guide 1.127 (Rev. 1, 3/78)	Inspection of Water-Control Structures Associated With Nuclear Power Plants

~~The Regulatory Guide applies only to water-control structures (e.g., dams, reservoirs, conveyance facilities) specifically built for use in conjunction with a nuclear power plant and whose failure could cause radiological consequences adversely affecting the public health and safety.~~

~~Since there are no structures of this type at the Seabrook Station, there is no potential for adverse safety affects from a failure of such. Therefore, Regulatory Guide 1.127 is not applicable to Seabrook Station.~~

DELETE

See insert on next page

Regulatory Guide 1.128 (Rev. 1, 10/78)	Installation Design and Installation of Large Lead Storage Batteries for Nuclear Power Plants

The recommendations of Regulatory Guide 1.128 have been followed.

The subject matter of this guide is discussed in Subsections 8.3.2 and 8.3.3.

insert for
FSAR page 1.8-48

"The recommendations of Regulatory Guide 1.127, Rev. 1, will be met by developing and implementing an appropriate inservice inspection and surveillance program for the flood protective structures. These flood protective structures consist of the stone revetments, reinforced concrete vertical seawall, and the sheet pile retaining wall."