



**North
Atlantic**

Energy Service Corporation

SEABROOK STATION UNIT 1

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

License Amendment Request No. 93-08
Independent Technical Reviews

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 Description of Proposed Changes
- Section II - Markup of Proposed Changes
- Section III - Retype of Proposed Changes
- Section IV - Safety Evaluation of Proposed Changes
- Section V - Determination of Significant Hazards for Proposed Changes
- Section VI - Proposed Schedule for License Amendment Issuance and Effectiveness
- Section VII - Environmental Impact Assessment

Sworn and Subscribed
to before me this

18th day of June, 1993

Tracy A. DeCredico
Notary Public

Ted C. Feigenbaum

Ted C. Feigenbaum
Senior Vice President and Chief Nuclear Officer

TRACY A. DECREDICO, Notary Public
My Commission Expires October 3, 1995

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I. Introduction and Description of Proposed Changes

A Introduction

The purpose of License Amendment Request 93-08 is to propose changes to Seabrook Station Technical Specification 6.2.3, Independent Safety Engineering Group (ISEG). The proposed changes revise the title of Technical Specification 6.2.3 to Independent Technical Reviews and delete the requirement to maintain a five person organization, known as the ISEG, that is dedicated to performing the independent technical reviews. The proposed revision to Technical Specification 6.2.3 maintains the requirement to perform the reviews specified in the current Technical Specification and requires that the reviews be performed by personnel who are independent of the plant management chain.

North Atlantic has long recognized that the current Technical Specification 6.2.3 does not provide flexibility in the performance of the required reviews. In addition, the Technical Specification places a constraint on North Atlantic by requiring the establishment of a separate organization, composed of at least five full-time engineers, that is dedicated to the performing the independent technical reviews. This constraint places unnecessary limitations upon North Atlantic's utilization of its technical resources in that it requires some duplication of effort in order to ensure that the ISEG reviews the specified material while it also maintains independence related to in-line functions such as assigning action items, scheduling and expediting the completion of activities. In some cases, the ISEG is not the organization most qualified to perform the reviews of a particular event or industry occurrence. In these cases there is a duplication of review effort as North Atlantic always strives to perform the best review or analysis possible even if it means duplicating effort. In these cases where effort is duplicated places an unnecessary burden upon North Atlantic and causes resources to be utilized in a manner that is not the most effective and does not provide any additional benefit with regard to protecting the health and safety of the public.

It is apparent that the NRC and the industry have also recognized that the current ISEG Technical Specification does not provide flexibility and significantly constrains the ability of a licensee to most effectively utilize its resources. This Specification was reviewed during the development of the Improved Standard Technical Specifications. With the issuance of NUREG-1431, Standard Technical Specifications Westinghouse Plants, the ISEG Specification has been replaced by a substantially more flexible Specification that continues to require the reviews, which are currently specified in Specification 6.2.3, to be performed. However, the Improved Technical Specifications delete the requirement for the establishment of a five person organization assigned to perform the specified reviews.

In addition, the NRC's Regulatory Review Group, in its draft "Assessment of the Seabrook Station Operating License" dated February 1993, examined Technical Specification 6.2.3. The Regulatory Review Group chose this item for review because it is very prescriptive with regard to manpower requirements. The Regulatory Review Group assessment noted that in the Improved Standard Technical Specifications the ISEG has been replaced with an independent review function which provides a relaxation of the five person staffing requirement and permits more flexible methods of performing the reviews. The Regulatory Review Group stated that this flexibility includes the establishment of standing or ad hoc committees or the assignment of

reviews to existing capable individuals or groups. The Regulatory Review Group concluded that the:

"Seabrook Technical Specification requirement related to the composition of the ISEG provides no flexibility."

Furthermore, the Regulatory Review Group noted that a Technical Specification change could be submitted adopting the Improved Standard Technical Specification approach and thereby providing considerable flexibility in the implementation of what is currently the ISEG review requirement.

North Atlantic Executive management reviewed the Regulatory Review Group report and the Improved Standard Technical Specifications and concurred that the ISEG composition requirement does not allow North Atlantic management to effectively manage company resources. Therefore, North Atlantic has determined that it is in the best interests of the company to pursue a Technical Specification revision that utilizes the concepts provided in the Improved Standard Technical Specifications to delete the ISEG composition requirement and establish an independent technical review requirement in its place. This proposed Technical Specification revision is consistent with North Atlantic's initiative to reduce requirements that are in excess of those required by regulation and which do not affect the safe operation of the plant. North Atlantic believes that this approach is consistent with the Executive Order issued by President Bush and with the current NRC policy as stated during the 1993 Regulatory Review Conference.

In addition, the North Atlantic commitment to implement NUREG-0737, Item I.B.1.2 will be revised to delete the commitment to maintain a full-time five person organization to perform the independent technical reviews. This change will necessitate the revision of Updated Final Safety Analysis Report (UFSAR) Section 1.9, Compliance with NUREG-0737: Clarification of TMI Action Plan Requirements. This UFSAR revision is consistent with the revision to Technical Specification 6.2.3 and is provided for information in Section VIII, Supporting Information. In addition, UFSAR Section 13.4.3, Independent Safety Engineering Group (ISEG), will be revised to be consistent with proposed changes to Technical Specification 6.2.3. A copy of the revision to UFSAR Section 13.4.3 is also provided for information in Section VIII.

The proposed changes adopt the independent review principles established in the Improved Standard Technical Specifications, NUREG-1431, Standard Technical Specifications Westinghouse Plants. North Atlantic believes that the proposed changes are consistent with the intent of the Executive Order issued by President Bush and with the NRC Regulatory Review effort as discussed during the 1993 Regulatory Information Conference. The ISEG composition requirement is burdensome to a utility as it restricts the capability to utilize resources to their maximum advantage and does not result in an increase in the protection afforded to the health and safety of the public.

The proposed changes require that a Technical Review Program be established and maintained. North Atlantic will issue the Technical Review Program within 30 days of the issuance of the license amendment and prior to its implementation.

B. Description of Proposed Changes

The proposed Technical Specification changes affect Technical Specification 6.2.3, Independent Safety Engineering Group, (ISEG). The proposed changes:

- Retitle this Specification as Independent Technical Reviews
- Require that a Technical Review Program be established to address all of the requirements that are currently listed in Specifications 5.2.3.1 and 6.2.3.4.
- Require that the personnel performing the Independent Technical Reviews be independent of the plant management chain.
- Establish a new records requirement in Specification 6.2.3.2.
- Delete the ISEG Composition requirement, and
- Establish a qualifications requirement for personnel performing the Independent Technical Reviews.

The utilization of equivalency based upon education and experience as defined in ANSI/ANS 3.1, 1981 has been previously accepted by the NRC for the Beaver Valley Power Station, Unit 2, Docket No. 50-412 as License Amendment No. 26.