

II. Markup of Proposed Changes

See attached markup of proposed changes to Technical Specifications.



ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

INSERT A

6.2.3.1 The ISEG shall function to examine station operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of station design and operating experience information, including units of similar design, which may indicate areas for improving station safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving station safety to the Senior Vice President.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of station activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Senior Vice President.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Control Room Commander in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the station.

6.3 TRAINING

6.3.1 A retraining and replacement licensed training program for the station staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the NRC letter dated March 28, 1980 to all licensees, and shall include familiarization with relevant industry operational experience.

~~*Not responsible for sign-off function.~~

INSERT A

6.2.3 INDEPENDENT TECHNICAL REVIEWS

A Technical Review Program shall be established, implemented and maintained to encompass the following Technical Review responsibilities.

FUNCTION

6.2.3.1 The Technical Review Program responsibilities shall encompass:

- a. NRC issuances, industry advisories, Licensee Event Reports, and other sources that may indicate areas for improving plant safety;
- b. Internal and external operating experience information that may indicate areas for improving plant safety;
- c. Plant operating characteristics, plant operations, modifications, maintenance and surveillance to verify independently that these activities are performed safely and correctly and that human errors are reduced as much as practical, and
- d. Making detailed recommendations to the Senior Vice President and Chief Nuclear Officer for procedure revisions, equipment modifications or other means of improving nuclear safety and plant reliability.

The Technical Review Program shall utilize sufficient on-site personnel who are independent of the plant management chain to perform the reviews.

RECORDS

6.2.3.2 Written records of technical reviews shall be maintained. As a minimum these records shall include the results of the activities conducted, the status of recommendations made pursuant to Specification 6.3.2.1 and an assessment of company operations related to the reviews performed.

QUALIFICATIONS

6.2.3.3 Personnel performing reviews pursuant to Technical Specification 6.2.3.1 shall have either a bachelor's degree in engineering or related science and at least 2 years professional level experience, at least 1 year of which shall be in the nuclear field, or equivalent education and experience as defined in ANSI/ANS 3.1, 1981, Section 4.1.

III. Retype of Proposed Changes

See attached retype of proposed changes to Technical Specifications. The attached retype reflects the currently issued version of Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

Revision bars are provided in the right hand margin to designate a change in the text.

ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT TECHNICAL REVIEWS

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6.2.3.1 The Technical Review Program responsibilities shall encompass:

- a. NRC issuances, industry advisories, Licensee Event Reports, and other sources that may indicate areas for improving plant safety;
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6.2.3.2 Written records of technical reviews shall be maintained. As a minimum these records shall include the results of the activities conducted, the status of recommendations made pursuant to Specification 6.3.2.1 and an assessment of company operations related to the reviews performed.

QUALIFICATIONS

6.2.3.3 Personnel performing reviews pursuant to Technical Specification 6.2.3.1 shall have either a bachelor's degree in engineering or related science and at least 2 years professional level experience, at least 1 year of which shall be in the nuclear field, or equivalent education and experience as defined in ANSI/ANS 3.1, 1981, Section 4.1.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Control Room Commander in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the station.

6.3 TRAINING

6.3.1 A retraining and replacement licensed training program for the station staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the NRC letter dated March 28, 1980 to all licensees, and shall include familiarization with relevant industry operational experience.

IV. Safety Evaluation of License Amendment Request 93-09 Proposed Changes

The purpose of License Amendment Request 93-08 is to propose changes to the 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 perform 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 perform 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 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 performed 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. The proposed license amendment will allow North Atlantic to utilize existing programs, such as the Operating Experience Review Program or the human Performance Enhancement Program, to perform some reviews and thereby enhance the effectiveness of the overall organization.

The NRC's Regulatory Review Group (RRG), in its draft "Assessment of the Seabrook Station Operating License" dated February 1993, examined Technical Specification 6.2.3. The RRG chose this item for review because it is very prescriptive with regard to manpower requirements. The RRG assessment noted that in the Improved Standard Technical Specifications (NUREG-1431, Standard Technical Specifications Westinghouse Plants) 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 independent technical reviews. The RRG concluded that the:

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

Furthermore, the RRG 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.

The proposed revision to Technical Specification 6.2.3 utilizes the approach to independent technical reviews that is presented in NUREG-1431, Standard Technical Specifications Westinghouse Plants. The proposed revision will ensure that the reviews specified in the current Specification 6.2.3 are performed through the establishment of a Technical Review Program. The Technical Review Program will allow North Atlantic to more effectively manage its resources in performing the required reviews.

The Technical Review Program will be defined in North Atlantic procedures which are available for review at Seabrook Station. From the perspective of review requirements and recording keeping there will not be a major change from the current practices which utilize the ISEG to perform the reviews, with the exception of maintaining a full-time five person organization dedicated to performing these reviews.

The proposed change adopts the independent review principles contained 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.

V. Determination of Significant Hazards for License Amendment Request 93-09 Proposed Changes

(1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The requirements of Technical Specification 6.2.3, Independent Safety Engineering Group (ISEG), specify reviews that must be performed and specify the staffing of a review organization. The changes proposed by License Amendment Request (LAR) 93-08 delete the requirement to maintain a full-time five person organization dedicated to performing the reviews. The revised Technical Specification 6.2.3, Independent Technical Reviews, continues to specify the review requirements that are in the current Technical Specification, and therefore satisfy the intent of NUREG-0737, Item I.B.1.2.

The proposed change does not affect the operation of the plant, nor does it revise any plant design, configuration, or procedures related to the operation of the plant. Since the physical plant is not affected and the only change is the deletion of the requirement to maintain a five person organization dedicated to performing the independent technical reviews, the probability of an accident previously evaluated is not affected by the changes proposed in License Amendment Request 93-08. Additionally, since the proposed change affects only the requirements for an organizational composition, it does not have any effect upon the radiological consequences of an accident previously evaluated.

Based upon the foregoing, the changes proposed by License Amendment Request 93-08 do not have any affect on the probability or consequences of nay previously evaluated acciden

(2) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes to Technical Specification 6.2.3 do not affect the design or function of any plant system, structure or component. The changes do not affect procedures related to plant operation nor the way any plant equipment is operated. Since the revision to the ISEG composition requirement does not affect the operation of equipment, change its reliability, nor revise the requirements for maintenance or repair, the proposed changes do not have the potential to introduce any new failure mechanism.

Therefore, the changes proposed by License Amendment Request 93-08 do not create the possibility of a new or different kind of accident from any previously evaluated accident.

(3) The proposed changes do not result in a significant reduction in the margin of safety.

The proposed revisions to Technical Specification 6.2.3 and in particular to the ISEG composition requirement modify an existing administrative requirement that was established with the issuance of the Seabrook Station Operating License. The changes do not alter the design or operation of any plant system structure or component, nor do they change the manner in which any plant system is operated.

The changes do not introduce any new failure mode and do not affect any previously analyzed accident or malfunction, nor do the changes create the possibility of a different accident or malfunction not previously analyzed. In addition, the ISEG composition requirement is an NRC imposed administrative requirement that is not referenced in the bases of any Technical Specification to define or establish a margin of safety for the operation of the plant.

Therefore, the changes proposed by License Amendment Request 93-08 do not reduce the margin of safety as defined in the bases of any Technical Specification.

VI. Proposed Schedule for License Amendment Issuance and Effectiveness

North Atlantic requests NRC review of License Amendment Request 93-08 and issuance of a license amendment having immediate effectiveness by December 30, 1993.

VII. Environmental Impact Assessment

North Atlantic has reviewed License Amendment Request 93-08 against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

VIII. Supporting Information

Revisions to Updated Final Safety Analysis Report Sections 1.9 and 13.4.3 are enclosed.

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reports are issued to the Committee and the results discussed at regularly scheduled meetings.

13.4.2.4 Audit Program

NSARC audits are considered management audits and are normally performed under the quality assurance audit program described in the Seabrook Operational Quality Assurance Program contained in Section 17.2.

13.4.3 Independent Safety Engineering Group

~~An Independent Safety Engineering Group (ISEG) performs reviews of plant operations, independent of those reviews performed by the Station Operation Review Committee (SORC) and the Nuclear Safety Audit and Review Committee (NSARC).~~ INSERT A

~~The ISEG is composed of five, full-time, dedicated engineers located onsite who report their findings to the Director - Quality Programs. Qualifications of the ISEG members meet or exceed the requirements in Section 4.7 of ANS 3.1, i.e., a Bachelor's degree in engineering and two to four years experience in their field, including one to two years nuclear experience. The ISEG members receive, as a minimum, the Training for Supervisors identified in Subsection 13.2.2. The ISEG was activated three months prior to fuel-loading.~~

13.4.3.1 Duties and Responsibilities

- a. The general review functions of the ISEG include:
1. Examine plant operating characteristics, NRC issuances, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety.
 2. Maintain surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly and that human errors are reduced as far as practicable.
 3. Perform independent review and evaluation of plant activities including maintenance, modifications, operational problems, and operational analysis, and aid in the establishment of programmatic requirements for plant activities.
 4. Where useful improvements can be achieved, this group develops and presents detailed recommendations to corporate management for such items as revised procedures or equipment modifications.
- b. The ISEG is not responsible for sign-off functions such that it becomes involved in the operating organization.

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~~13.4.3.2 Reports~~

~~The ISEG prepares written summaries of reviews and evaluations performed as noted above. These summaries include the results of and recommendations from such reviews and evaluations. Monthly reports containing a summary of work completed and recommendations made are forwarded to the Director - Quality Programs, with an information copy to the NHY President and Chief Executive Officer. The Director - Quality Programs has been given appropriate and sufficient authority to ensure that results and recommendations of reports are addressed and acted upon by the operating organizations.~~

~~13.4.3.3 Charter~~

~~The composition, qualifications, duties and responsibilities, and reporting requirements stated above are incorporated into the ISEG Charter.~~

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Response:

See Updated FSAR Subsection 13.2.1.

Task I.A.3.1 Revise Scope and Criteria for Licensing Examinations - Simulator Exams (Item 3) (NUREG-0737)

Position:

Simulator examinations are included as part of the licensing examinations.

Response:

See Updated FSAR Subsection 13.2.1.

Task I.B.1.2 Independent Safety Engineering Group (NUREG-0737)

Position:

Each applicant for an operating license shall establish an onsite Independent Safety Engineering Group (ISEG) to perform independent reviews of plant operations.

The principal function of the ISEG is to examine plant operating characteristics, NRC issuances, Licensing Information Service advisories, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety. The ISEG is to perform independent review and audits of plant activities including maintenance, modifications, operational problems, and operational analysis, and aid in the establishment of programmatic requirements for plant activities. Where useful improvements can be achieved, it is expected that this group will develop and present detailed recommendations to corporate management for such things as revised or equipment modifications.

Another function of the ISEG is to maintain surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly and that human errors are reduced as far as practicable. ISEG will then be in a position to advise utility management on the overall quality and safety of operations. ISEG need not perform detailed audits of plant operations and shall not be responsible for sign-off functions such that it becomes involved in the operating organization.

Response:

See Updated FSAR Subsections 13.2.2 and 13.4.3 and Technical Specification 6.2.3.

INSERT B

INSERT A

13.4.3 INDEPENDENT TECHNICAL REVIEWS

A Technical Review Program is established, implemented and maintained to encompass the following Technical Review Responsibilities and to address the reviews of NUREG-0737, Task I.B.1.2.

13.4.3.1 Function

The Technical Review Program responsibilities encompass:

- a. NRC issuances, industry advisories, Licensee Event Reports, and other sources that may indicate areas for improving plant safety;
- b. Internal and external operating experience information that may indicate areas for improving plant safety;
- c. Plant operating characteristics, plant operations, modifications, maintenance and surveillance to verify independently that these activities are performed safely and correctly and that human errors are reduced as much as practical; and
- d. Making detailed recommendations to the Senior Vice President and Chief Nuclear Officer for procedure revisions, equipment modifications or other means of improving nuclear safety and plant reliability.

The Technical Review Program utilizes sufficient on-site personnel who are independent of the plant management chain to perform the reviews described above and specified in Technical Specification 6.2.3.1.

13.4.3.2 Records

Written records of technical reviews are maintained. As a minimum these records include the results of the activities conducted and the status of recommendations made pursuant to Technical Specification 6.2.3.1 and an assessment of company operations related to the reviews performed.

13.4.3.3 Qualifications

Personnel performing the reviews described above and defined in Technical Specification 6.2.3.1 have either a bachelor's degree in engineering or related science and at least 2 years professional level experience, at least 1 year of which is in the nuclear field, or equivalent education and experience as defined in ANSI/ANS 3.1, 1981, Section 4.1.

INSERT B

North Atlantic ensures that the reviews addressed in Task I.B.1.2 are performed as required through the implementation of a Technical Review Program. See Updated FSAR Subsection 13.4.3 and Technical Specification 6.2.3 for details.