

New Hampshire Yankee

Ted C. Feigenbaum
President and
Chief Executive Officer

NYN- 90187

October 19, 1990

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

Attention: Document Control Desk

References: Facility Operating License No. NPF-86, Docket No. 50-443

Subject: Request for License Amendment; Battery Surveillance Requirements

Gentlemen:

Pursuant to 10 CFR 50.90, New Hampshire Yankee (NHY) hereby proposes to amend the Seabrook Station Operating License (Facility Operating License NPF-86) by incorporating the proposed changes, provided herein as Enclosure 1, into the Seabrook Station Technical Specifications. These proposed changes will delete the requirement that certain surveillance tests be performed during shutdown.

The basis for this proposed change is provided in Enclosure 2, which includes a safety evaluation of the proposed changes. Based upon the information contained in Enclosure 2, NHY has concluded that the proposed change does not involve an Unreviewed Safety Question pursuant to 10 CFR 50.59, nor does it involve a Significant Hazards Consideration pursuant to 10 CFR 50.92.

New Hampshire Yankee has reviewed the proposed change in accordance with the criteria specified in 10 CFR 50.92 and has determined that the proposed change would not

1. Involve a significant increase in the probability or consequences of any accident previously evaluated. The proposed change deletes the requirement that certain surveillances be performed "during shutdown". The Seabrook design for vital DC systems incorporates two 100% capacity battery banks for each train. Technical Specifications currently allow one battery bank in one train to be inoperable for up to 30 days. Removal of one battery bank in one train from service for the performance of surveillance testing does not decrease the functional capability of the DC system below the level currently allowed by the Technical Specifications. Additionally, in accordance with Technical Specification requirements, both battery banks and chargers in the opposite

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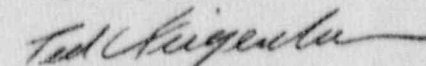
train will be OPERABLE during the performance of this testing. Performance of the surveillance testing at power with the battery removed from service will not affect any other system, structure or component; therefore, the proposed change does not increase the probability of an accident previously evaluated. Assuming an additional single failure (eg, failure of the opposite DC train), a minimum of one 100% capacity battery bank will remain available during any postulated accident. With this minimum capability, sufficient instrumentation and control capability exists for monitoring and maintaining the unit status following an accident. Therefore, the consequences of an accident previously evaluated will not be increased.

2. Create the possibility of a new or different kind of accident from any previously evaluated. During the performance of this testing, the battery will be isolated from the vital DC system. No other system will be affected by this testing. Additionally, in accordance with the Technical Specifications, the alternate battery of the same train and both opposite train batteries will remain OPERABLE during this testing. Therefore, the possibility of an accident of a different type than any previously evaluated is not created by this change.
3. Involve a significant reduction in a margin of safety. The Seabrook design incorporates two 100% capacity battery banks for each train; removing a battery bank from service while operating will not decrease the functional or safety capabilities of the DC system below the level currently specified by the Technical Specifications. The allowed outage time for the battery banks is based upon the guidance of Regulatory Guide 1.93. Though the Regulatory Guide indicates that a battery should only be removed from service for the performance of corrective maintenance, the recommendations of this Regulatory Guide are based upon a system design encompassing only 100% capacity per train. With a battery bank removed from service, the affected train continues to meet assumed 100% capacity. Therefore, the proposed change does not reduce the margin of safety for any Technical Specification.

New Hampshire Yankee respectfully requests approval of these proposed changes by December 7, 1990 to afford continued uninterrupted plant operation without compromising our ability to perform the surveillance testing of the batteries prior to expiration of the allowed surveillance intervals. New Hampshire Yankee believes that this schedule provides sufficient time for both NHY and NRC to preclude exceedance of the surveillance interval and to perform the testing without need for regulatory relief.

Should you have any 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

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Enclosure(s)

TCF/RRB:tad