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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
PUBLIC SERVICE COMPANY OF NEW	)	
HAMPSHIRE, et al.	)	Docket Nos. 50-443 OL
	)	50-444 OL
(Seabrook Station, Units 1 & 2)	)	

APPLICANTS' ELEVENTH MOTION FOR  
SUMMARY DISPOSITION  
(CONTENTION NECNP I.C)

Pursuant to 10 CFR § 2.749, the Applicants hereby  
move for summary disposition of contention NECNP I.C

This motion is submitted upon the affidavit of  
Peter L. Anderson, attached hereto. As is set forth in  
Mr. Anderson's affidavit, all of the equipment  
necessary to insure those functions of the pumphouse  
upon which reliance is placed to preserve safety are

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classified as safety related and are environmentally qualified. No such reliance is placed upon equipment for indication of impending freezing conditions, since this is accomplished by inspection by personnel with adequate advance warning to allow operator corrective actions.

Respectfully submitted,

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Dated: February 9, 1983

STATEMENT OF MATERIAL FACTS  
AS TO WHICH THERE IS NO DISPUTE

1. Under the regulations, only those portions of the emergency feedwater pumphouse Heating Ventilation and Air Conditioning ("HVAC") system that are essential to support the safety function associated with the equipment in the pumphouse are required to be classified as safety related and environmentally qualified.
2. At Seabrook, only the fans, dampers, motors, electrical cable, and instrumentation and control components are, in fact, so relied upon. That equipment is, in fact, classified as safety related and environmentally qualified.
3. The primary safety concern of the pumphouse HVAC equipment is its ability to remove heat generated by the emergency feedwater pumps when those pumps are in operation. The equipment needed to perform that function is classified as safety related and is environmentally qualified.
4. No reliance is placed upon the HVAC system either to prevent freezing in the pumphouse when the emergency feedwater pumps are in operation or to provide indication of impending freezing conditions. The former function is provided by the emergency feedwater pumps themselves, since their own heat generation will protect the equipment in the pumphouse from freezing. The latter function is performed by inspection procedures which provide adequate advance warning of HVAC malfunctions to allow operator corrective actions.

CERTIFICATE OF SERVICE

I, R. K. Gad III, one of the attorneys for the Applicants herein, hereby certify that on February 9, 1983, I made service of the within "Applicants' Eleventh Motion for Summary Disposition (Contention NECNP I.C)" by mailing copies thereof, postage prepaid, to:

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