

# New Hampshire Yankee

Ted C. Feigenbaum  
President and  
Chief Executive Officer

NYN-90210

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

Attention: Document Control Desk

- References:
- (a) Facility Operating License No. NPF-86, Docket No. 50-443
  - (b) PSNH Letter SBN-806, Dated May 29, 1985 "Seabrook Station Technical Specification Improvement Program", J. DeVincentis to G. W. Knighton
  - (c) USNRC Letter Dated May 20, 1986, "Seabrook Station Technical Specification Improvement Program", T. M. Novak to P. J. Harrison

Subject: FSAR Section 16.3 - Technical Specification Improvement Program

Gentlemen:

In 1985, during the development of the Seabrook Station Technical Specifications, New Hampshire Yankee (NHY) proposed to the NRC (Reference b) that certain Technical Specifications be removed from the Standard Technical Specification format, as this information is located in "other licensee - controlled documents". On May 20, 1986 (Reference c) the NRC concurred with transfers of the information but stated that the information should also be included as an Appendix to Chapter 16 of the FSAR. The NRC stated that by making the material part of the FSAR, it would ensure that NHY applied the requirements of 10 CFR 50.59 to any changes. In addition, the staff felt that by incorporating this information as part of the FSAR, it would avoid the introduction of another document for staff review. The information from the Technical Specifications was eventually transferred to the Nuclear Production Technical Requirements Manual (NPTR) and duplicated in Section 16.3 of the FSAR.

The NPTR requires a safety evaluation to be performed in accordance with NHY Procedure 11210, "10 CFR 50.59 Evaluations", for all NPTR changes. The NPTR also states that each proposed change to the NPTR must be reviewed by the Station Operation Review Committee (SORC), the Nuclear Safety Audit Review Committee (NSARC) and approved by the Station Manager and the Executive Director - Nuclear Production prior to implementation in the NPTR.

The FSAR and the NPTR are "controlled documents" that do not follow the same revision schedule. The NPTR is revised on an as needed basis (currently Revision 16), while Section 16.3 of the FSAR will be revised yearly per 10 CFR 50.71(e). This creates the potential for the FSAR to be inconsistent with the NPTR.

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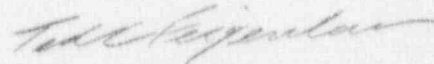
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To eliminate the potential for out-of-date information being relied upon, NHY requests NRC concurrence for removing Technical Requirements from the FSAR so this information can be maintained solely in the Nuclear Production Technical Requirements Manual. A reference statement in Section 16.3 of the FSAR will be added to direct the user to the NPTR to obtain the information formerly available in that section.

To ensure that the NRC is kept informed of all changes to the NPTR, NHY will continue to provide a description of Technical Requirement Changes as part of the 10 CFR 50.59 Quarterly Reporting process.

Should you have any questions concerning this request, please contact Mr. Terry L. Harpster, Director of Licensing Services, at (603) 474-9521, extension 2765.

Very truly yours,



Ted C. Feigenbaum

TCF:TGP/ssl

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