

November 23, 1982
SBN-386
T.F. B7.1.2

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

Attention: Mr. George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

- References: (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444
- (b) USNRC Memorandum, dated October 14, 1982, "Notice of Meeting Regarding Open Items in the Safety Review," L. L. Wheeler to J. D. Kerrigan.

Subject: Response to Open Item (SRP 13.4.3; Licensee Qualification Branch)

Dear Sir:

As a result of a recent meeting with the NRC Staff [Reference (b)], we offer the following response to the subject open item.

Item (SRP Section 13.4.3)

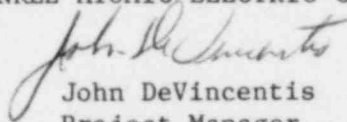
Provide a description of the Independent Safety Engineering Group (ISEG) Charter.

Response:

The information concerning the composition, qualifications, duties and responsibilities, and reporting requirements of the ISEG as stated in FSAR Section 13.4.3 will be incorporated in the ISEG Charter. FSAR Section 13.4.3 and Technical Specification 6.2.3 will be revised as shown in the attachments to this letter to reflect this commitment.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY


John DeVincentis
Project Manager

8212020286 821123
PDR ADOCK 05000443
A PDR

Attachment

cc: Mr. R. Gallo
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Atomic Safety and Licensing Board Service List

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at any time in carrying out its responsibilities. The Charter establishes the powers of the Chairman and the use of subcommittees in performing its function. It also establishes the requirements for distribution of reports and/or meeting minutes and its authorization for initiating work.

13.4.3 Reviews

Technical Specification 6.5.2.8 defines the Committee review requirements. These are conducted through a combination of document summary reviews, presentations at regularly scheduled meetings and special meetings held to review proposed changes to the Operating License or Technical Specifications. The NSAR Committee will be required to review and approve all Operating License/Technical Specification changes prior to their submittal to the NRC. Particular document review assignments may be made by the NSARC to either individual NSARC members or to subcommittees with the appropriate expertise. Their reports or summary documents are reviewed by the full Committee at regularly scheduled meetings. Certain activities, such as In-Plant Audits, are performed under the cognizance of the NSARC. In such cases, written reports are issued to the Committee and the results discussed at regularly scheduled meetings.

13.4.2.4 Audit Program

A program of quality assurance audits is 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) will perform reviews on plant operations, independent of those reviews performed by the Station Operation Review Committee (SORC) and the Nuclear Safety Audit and Review Committee (NSARC).

The ISEG will be composed of a committee of five, full time, dedicated engineers located on site who report their findings to the Nuclear Services Manager. Qualifications of the ISEG members will meet or exceed the requirements in Section 4.4 of ANS 3.1, i.e., a bachelor's degree in engineering and two to four years experience. The ISEG members will receive as a minimum the Training for Supervisors identified in Section 13.2.2. The ISEG will be activated approximately 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, Licensing Information Service advisories, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety.

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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 reviews and audits 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 will develop and present detailed recommendations to corporate management for such things 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.

13.4.3.2 Reports

The ISEG will prepare written summaries of reviews and evaluations performed as noted above. These summaries will include the results of, and recommendations resulting from, such reviews and evaluations. Monthly reports containing a summary of work completed and recommendations made will be forwarded to the Nuclear Services Manager, with information copies to the Vice President - Nuclear Production and Executive Vice President.

13.4.3.3 Charter

The composition, qualifications, duties and responsibilities, and reporting requirements stated above will be incorporated in the ISEG Charter.