January 7, 1983

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 50-444
(Seabrook Station, Units 1 and 2)	)	

NECNP THIRD SET OF INTERROGATORIES AND REQUESTS FOR DOCUMENTS TO APPLICANTS ON CONTENTIONS I.A.2., I.B.1., I.B.2., and I.C.

INSTRUCTIONS FOR USE

The following interrogatories are to be answered in writing and under oath by an employee, representative or agent of the Applicants with personal knowledge of the facts or information requested in each interrogatory.

The following definitions shall apply to thes interrogatories:

1. "Document" shall mean any written or graphic matter of Communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other means, computer data, computer printouts, photographs, microfilm, microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of

meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

2. "Identify" shall mean with respect to any document, to state the following respecting the document: its title, its date, the author of the document, the person to whom the document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3. "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or proposed effect of such action; any document recording or documenting such action.

4. "Describe" with respect to any action or matter shall mean state the following regarding such action or matter: the substance or nature of such action or matter; the persons participating in or having knowledge of such action or matter; the current and past business positions and addresses of such persons; the existence and location of any and all documents relating to such action or matter.

I.A.2. Environmental Qualification of Electric Valve Operators

1. Explain the difference between the terms "safety related" and "Class 1E".

2. Identify all reactor components which are safety related but not Class 1E.

3. Identify all reactor components which are Class 1E but not safety related.

4. How does the environmental qualification of valve operators identified by Applicants in Table 1.A.2-3 as safety related and Class IE differ from the environmental qualification of valves which are Class 1E but not safety related?

5. In light of the discrepancy between Table I.A.2-3, which distinguishes safety related valves from Class 1E valves, please revise your answer to Interrogatory 8 of NECNP First Set of Interrogatories on Contention I.A.2, I.B.1, I.B.2, and I.C., which equates them. In addition, revise answers to all other interrogatories where the terms "Class 1E" and "safety related" cannot be used interchangeably.

6. Are Applicants currently preparing an environmental qualification report for the NRC Staff? If the answer if yes, please respond to the following questions:

a) Describe the scope of the report.

b) Describe the degree to which the report is completed.

c) Identify all individuals involved in the preparation of the report and their place of employment.

d) On what date will Applicants submit the report to the NRC Staff?

7. What is the basis for classification of equipment as "safety related"?

a) Describe in detail the process by which Applicants determine whether a particular piece of equipment or system at the Seabrook plant is safety related.

b) Have Applicants employed any probabalistic risk assessments or other studies at Seabrook to determine what equipment or systems should be considered safety related? If so, please identify and describe them.

8. At page 3.11(B)-1 of the FSAR, Applicants state that all Class 1E instrumentation and electrical equipment required to operate during and subsequent to a design basis event is defined according to IEEE-308-1971. Does Applicants' list of Class IE electrical equipment and instrumentation also meet the definition of IEEE-308-1980? If not, state the reasons and list any additional pieces of equipment which would be included under the definition of IEEE-308-1980.

9. Please identify and provide access to Applicants' Inservice Testing Program for pumps and valves.

10. Describe the differences between qualifications of safety grade electrical equipment and qualification of safety grade mechanical equipment.

11. Describe in detail the recirulating fluid radiation dose study identified by Applicants in response to Interrogatory 11, NECNP First Set of Interrogatories on Contentions I.A.2, I.B.1, I.B.2., and I.C.

a) What was the date of the study and who prepared it?

b) What were the results of the study?

c) What impact did the study have on equipment qualification at Seabrook?

d) Did Applicants submit the study to the NRC for review?

I.B.1. Environmental Qualification of Residual Heat Removal System

12. Identify all high pressure decay heat removal systems relied upon by Applicants at Seabrook.

a) Which or what parts of the above-identified systems are safety grade, and which are not safety grade?

b) Which of the above-identified systems are considered essential to the residual heat removal process?

13. Identify the normal and emergency operating procedures for residual heat removal at Seabrook.

14. On page 22 of Applicants' Answers to NECNP First Set of Interrogatories on Contentions I.A.2., I.B.1., I.B.2., and I.C., Applicants state that "not all portions of the above listed systems are required to perform the residual heat removal function." Please clarify to what systems that statement refers. For each system, list those portions which are required to perform the residual heat removal function; and list those portions which are not required to perform the residual heat removal function.

15. Have Applicants performed any probabalistic risk assessments to determine all systems which may be required to remove heat from the core in an accident? If so, please identify and provide access to them.

I.B.2. Duration of Environmental Qualification

16. Do Applicants have written surveillance and maintenance programs for environmentally qualified equipment at Seabrook?

a) Do these programs encompass all environmentally qualified equipment?

b) Identify all such equipment for which no surveillance and maintenance plans exist.

c) Identify and provide access to all maintenance and surveillance plans for safety grade/Class 1E equipment and systems.

2. In answer to Interrogatory 6 of NECNP Second Set of Interrogatories on Contentions I.A.2., I.B.1., I.B.2., and I.C., Applicants state that safety systems are qualified to a duration of one year. Do Applicants' surveillance and maintenance programs provide for yearly inspection and replacement of equipment?

a) If not, please identify the components for which a longer inspection interval is provided, and state the interval.

b) Identify all safety grade/Class 1E components for which no surveillance is provided after the first year of operation.

I.C. Emergency Feedwater Pumphouse HVAC

1. Is the alarm which notifies the operator of freezing temperatures in the emergency feedwater pumphouse qualified to operate under freezing temperatures? If so, to what temperatures is it qualified?

2. Has any analysis been performed at Seabrook to determine whether cold winter temperatures may render essential equipment inoperable? If so, please identify those studies and describe their results.

3. What procedures and instrumentation are provided to alert the operator of the need to monitor temperatures in the emergency feedwater pumphouse and to inform the operator when corrective action is necessary?

4. Are the temperature sensor, the alarm, and the heating system for the emergency feedwater pumphouse attached to an emergency power system? Please describe the power source for these systems.

Respectfully Submitted

Diane Curran

Lee Bishop

Harmon & Weiss
1725 I Street, N.W.
Suite 506
Washington, D.C. 20006

(202) 833-9070