North Atlantic

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The Northeast Utilities System

Ted C. Feigenbaum
Senior Vice President &
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January 25, 1995

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

Attention: Document Control Desk

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

Subject: License Amendment Request 94-08: Containment Type A Integrated Leak Rate Test (ILRT) (TAC No. M91341)

Gentlemen:

North Atlantic Energy Service Corporation (North Atlantic) encloses herein License Amendment Request 94-08. This License Amendment Request is submitted pursuant to the requirements of 10CFR50.90 and 10CFR50.4.

The purpose of License Amendment Request 94-08 is to propose changes to the Seabrook Station Technical Specifications to revise Surveillance Requirement 4.6.1.2.a from a specific schedule for performance of containment Integrated Leak Rate Tests (ILRTs) of "40±10 months" to "intervals as specified in 10 CFR 50, Appendix J". This change does not affect the ILRT frequency, methodology, or acceptance criteria. The specific 40 ± 10 month test interval is proposed to be changed to provide flexibility in the scheduling of future ILRT's. Type A, B, and C tests would continue to be performed in accordance with Appendix J to 10 CFR 50.

License Amendment Request 94-08 has been reviewed and approved by the Station Operation Review Committee and the Nuclear Safety Audit Review Committee.

As discussed in Section IV of the License Amendment Request, the proposed changes do not involve a significant hazards consideration pursuant to 10CFR50.92. A copy of this letter and the enclosed License Amendment Request have been forwarded to the State of New Hampshire State Liaison Officer pursuant to 10CFR50.91(b). In addition, North Atlantic has determined that License Amendment Request 94-08 meets the criteria of 10CFR51.22(c)(a) for a categorical exclusion from the requirements for an Environmental Impact Statement (see Section VI enclosed).

North Atlantic requests NRC review of License Amendment Request 94-08 and issuance of a license amendment by July 25, 1995 (see Section V enclosed).

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

Very truly yours,

Ted C. Feigenbaum

Enclosure

TCF:JMPjr/sm

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North Atlantic

SEABROOK STATION UNIT 1

Facility Operating License NPF-86
Docket No. 50-443

License Amendment Request No. 94-08
CONTAINMENT INTEGRATED LEAK RATE TEST(ILRT)

This License Amendment Request is submitted by North Atlantic Energy Service Corporation pursuant to 10CFR50.90. The following information is enclosed in support of this License Amendment Request:

- **Section I - Introduction and Safety Evaluation for Proposed Changes**
- **Section II - Markup of Proposed Changes**
- **Section III - Retype of Proposed Changes**
- **Section IV - Significant Hazards Consideration Evaluation**
- **Section V - Proposed Schedule**
- **Section VI - Environmental Impact Assessment**

Sworn and Subscribed
to before me this
25th **day of** January **, 1995**

Susan Allen
Notary Public

Bruce L. Drawbridge
Executive Director - Nuclear Production

I. Introduction and Safety Evaluation for Proposed Changes

A. Introduction

The purpose of License Amendment Request 94-08 is to propose changes to the Seabrook Station Technical Specifications to revise Surveillance Requirement 4.6.1.2.a from a specific schedule for performance of containment Integrated Leak Rate Tests (ILRTs) of "40±10 months" to "intervals as specified in 10 CFR 50, Appendix J".

Type A tests are defined in Section II.F of 10 CFR 50, Appendix J, as those tests intended to measure the primary reactor containment overall integrated leakage rate at periodic intervals. The plant configuration required to perform the ILRTs necessitates that they be performed during refueling outages with the time interval between ILRTs being approximately 40 months based on the performance of three such tests at approximately equal intervals during each 10-year service period.

The proposed Technical Specification change eliminates the specific requirements for the frequency of Type A tests and adds a general requirement to perform Type A tests "at intervals specified in 10 CFR 50, Appendix J".

Satisfactory leakage results are a requirement for the establishment of containment operability. Neither the frequency nor the required number of Type A tests would be changed by the proposed revisions. Also, the maximum allowable leakage rate at the calculated peak containment pressure would not be changed. The specific 40 ± 10 month test interval is proposed to be changed to provide flexibility in the scheduling of future ILRT's. Type A, B, and C tests would continue to be performed in accordance with Appendix J to 10 CFR 50. Type A test acceptance criteria would not be changed and combined leakage of penetrations subject to Type B and Type C tests would be maintained within the required limits. Also, the proposed changes do not affect the design basis of the containment and would not change the response of containment during a design basis accident. Finally, the testing method, acceptance criteria, and the Bases to the Technical Specifications are not changed by the proposed revision.

Similar technical specification changes were approved by the NRC for Byron Station, Units 1 and 2 (Amendment No. 62 to NPF-37 and Amendment No. 62 to NPF-66) and Braidwood Station Units 1 and 2 (Amendment No. 52 to NPF-72 and Amendment No. 52 to NPF-77).

B. Safety Evaluation for Proposed Changes

The purpose of the Type A test (containment integrated leakage rate test) is to assure that the total leakage from containment does not exceed the maximum allowable leakage rate specified in the Seabrook Station Technical Specifications, Updated Final Safety Analysis Report (UFSAR), and Appendix J to 10 CFR 50. The maximum allowable containment leakage rate is

an input to the calculation which determines the maximum allowable offsite dose during a design basis accident. The maximum allowable offsite dose must comply with the requirements of 10 CFR 100.

Currently, Surveillance Requirement 4.6.1.2.a of the Seabrook Station Technical Specifications requires that three Type A tests be conducted at intervals of 40 ± 10 months per each 10-year service period. Additionally, it requires that the third test of each set be conducted during the shutdown for the 10-year plant inservice inspection.

North Atlantic is proposing to revise Surveillance Requirement 4.6.1.2.a by replacing the requirement that Type A tests be conducted at "40 ± 10 months intervals" with "at intervals specified in 10 CFR Part 50, Appendix J."

The proposed change to Surveillance Requirement 4.6.1.2.a of the Seabrook Station Technical Specifications does not make any physical or operational changes to existing plant structures, systems, or components (SSCs), nor does it modify the manner in which SSCs are operated. In addition, the proposed change does not modify the test methodology, frequency or acceptance criteria for the Type A tests. The proposed change does not degrade the performance of the containment as a safety system or prevent actions assumed in the accident analyses. The proposed change does not modify the maximum allowable leakage rate at the calculated peak containment pressure, does not impact the design basis of the containment, and does not change the post-accident containment response. In particular, the site boundary radiation doses will remain limited by the dose guidelines of 10 CFR 100 as described in the Technical Specification Bases 3/4.6.1.1.

The following sections of the Seabrook Station UFSAR are applicable to this proposed change. Section 3.1.2.7 outlines Seabrook Station's conformance to NRC general design criteria for containment design. Section 3.1.5.4 outlines Seabrook Station's conformance to NRC general design criteria for provisions for containment testing and inspection. Section 3.8.1.7 describes the testing and inservice inspection requirements including the structural integrity test of containment and the inspections required during Type A testing. Section 6.2.1.1.a describes the containment structure design basis including the requirement to maintain post accident offsite doses from radioactivity to less than the limits set forth in 10 CFR 100. Sections 6.2.6/.1/.2/.3/.4 describe the containment leakage testing program including the Appendix J Type A, B & C test requirements. Table 14.2-3, Item 37 is an abstract for the preoperational test program that describes the requirements for the preoperational Type A tests. The above sections of the UFSAR are not affected by the proposed changes to the Technical Specifications.

Chapter 15 of the UFSAR documents the analyses of design bases accidents (DBA) at Seabrook Station. Any scenario or previously analyzed accident that results in offsite dose were evaluated as part of this analysis. The accident analyses contained in Chapter 15 are not affected by the proposed changes to the Technical Specifications.

This proposed Technical Specification change does not request any changes to the requirements for the Appendix J Type B and C testing. The Type B and C tests will continue to be performed in accordance with the requirements of Surveillance Requirement 4.6.1.2.d. These tests confirm that the leak-tightness of the containment isolation valves and penetrations have been maintained. Maintaining the leakage through the containment boundary to the atmosphere within a specific value ensures that the plant complies with the requirements of 10 CFR 100.

Technical Specification Bases 3/4.6.1.2 (Containment Leakage) states:

> The surveillance testing for measuring leak rates is consistent with the requirements of Appendix J of 10 CFR Part 50.

This statement is consistent with the proposed change to Surveillance Requirement 4.6.1.2.a, therefore this basis is not affected. No other Technical Specification Bases address the frequency of Appendix J testing.

Based on the above, the proposed change does not involve a reduction in the margin of safety as defined in the basis for any Technical Specification.

II. Markup of Proposed Changes

See attached markup of proposed changes to Technical Specifications.