

DCD

December 16, 1994

EA 94-230

Mr. Ted C. Feigenbaum  
Senior Vice President and Chief Nuclear Officer  
North Atlantic Energy Service Corporation  
Post Office Box 300  
Seabrook, New Hampshire 03874

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT NO. 50-443/94-24)

Dear Mr. Feigenbaum:

This letter refers to the NRC inspection activities conducted from September 27 through November 7, 1994, at Seabrook Nuclear Power Station, Seabrook, New Hampshire. The NRC inspection report was transmitted to you by letter dated November 22, 1994. An enforcement conference was held in the NRC Region I office on December 5, 1994, with you and other members of your staff. A list of attendees is enclosed (Enclosure 2). The conference was open to the public in accordance with the Commission's continuing trial program as published in the Federal Register, July 10, 1992, and July 19, 1994, and was recorded. The recorded tapes of the meeting will be placed in the NRC's Public Document Room. In addition, your letter to clarify a portion of the discussion during the enforcement conference, dated December 8, 1994, was considered.

During the enforcement conference, we discussed the events, their causes and safety significance, your short and long term corrective actions, and the adjustment factors specified in Section IV.B.2 of the NRC's Enforcement Policy (10 CFR Part 2, Appendix C). The results from your recent engineering review of the original design basis, concerning the built-in testability of the emergency power buses, identified no anomalous conditions. Your review determined that the difference between the monthly testing requirements and the equipment design resulted from inadequate configuration control during the licensing and implementation phases. Also, based on your presentation, we now better understand your decision made in mid 1993 to delay the review of safety significant surveillance procedures. Your planned corrective actions to submit a technical specification change, modify the undervoltage relay case to facilitate testing, enhance the corrective actions program, and provide additional guidance to plant workers in the evaluation of anomalies, seem appropriate. Enclosure 3 is a copy of the slides presented by your staff at the conference and provides additional details regarding the events and your subsequent corrective actions.

Nonetheless, the NRC concluded that the difference between the emergency power bus design and the monthly testing requirements resulted in brief periods in which the plant was outside its design basis. The brief disabling of the protection system during testing occurred without the proper control or analysis due to inadequate surveillance test procedures. Further, your staff had multiple opportunities to identify and promptly correct the inconsistency

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between the monthly testing method and the emergency power bus equipment design. We are concerned about the lack of aggressiveness by your staff to properly resolve these issues, which are similar to the inadequate evaluations associated with main steam isolation valve and tornado door deficiencies.

We have classified these two violations at Severity Level IV in the enclosed Notice of Violation (Notice). The bases for this classification were, in part, the limited safety significance of the issues, which was bounded by accident analyses, and the absence of indication of a programmatic breakdown in the control of your licensed activities. Nonetheless, any similar violation of such requirements in the future could result in escalated enforcement action.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice of Violation (Notice) when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be placed in the NRC Public Document Room. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, P.L. 96-511.

Sincerely,

ORIGINAL SIGNED BY:

Richard W. Cooper, II, Director  
Division of Reactor Projects

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

Enclosures:

1. Notice of Violation
2. List of Attendees
3. Copy of Presentation

Mr. Ted C. Feigenbaum

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cc w/encl:

B. Cronin, Legislative Assistant

W. DiProfio, Station Manager

B. L. Drawbridge, Executive Director of Nuclear Production

R. Hallisey, Director, Dept. of Public Health, Commonwealth of Massachusetts

T. Rapone, Massachusetts Executive Office of Public Safety

D. Tefft, Administrator, Bureau of Radiological Health, State of New Hampshire

K. Abraham, (2)

Commonwealth of Massachusetts, SLO Designee

NRC Resident Inspector

Nuclear Safety Information Center (NSIC)

PUBLIC

Seabrook Service List

State of New Hampshire, SLO

Seabrook Service List

4

bcc w/encl:  
Region I Docket Room (with concurrences)  
J. Rogge, DRP

bcc w/encl (VIA E-MAIL):  
W. Dean, OEDO  
A. DeAgazio, PD I-4, NRR  
P. McKee, PD I-4, NRR  
M. Shannon, NRR/ILPB

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OFFICE	RI/DRP	RI/DRP	RI/DRP	RI/DRP
NAME	R. Laura <i>[Signature]</i>	J. Rogge <i>[Signature]</i>	J. Durr <i>[Signature]</i>	R. Cooper <i>[Signature]</i>
DATE	12/15/94	12/15/94	12/15/94	12/16/94

CONCURRED

OFFICIAL RECORD COPY

TELEPHONICALLY

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Nuclear Power Station

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Panel  
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2

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Mr. George L. Iverson, Director  
New Hampshire Office of Emergency  
Management  
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Concord, New Hampshire 03301

Adjudicatory File (2)  
Atomic Safety and Licensing Board  
Panel Docket  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Jack Dolan  
Federal Emergency Management Agency  
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Courthouse Building, Room 442  
Boston, Massachusetts 02109

**LIST OF ATTENDEES**

**NORTH ATLANTIC ENERGY SERVICE CORPORATION**

**SEABROOK ENFORCEMENT CONFERENCE**

**DECEMBER 5, 1994, 1:00 P.M.**

**NORTH ATLANTIC ENERGY SERVICE CORPORATION**

W. DiProfio	Station Manager
B. Drawbridge	Executive Director - Nuclear Production
T. Feigenbaum	Senior Vice President and Chief Nuclear Officer
T. Harpster	Director of Licensing Services
J. Peschel	Regulatory Compliance Manager
J. Vargas	Director of Engineering

**U.S. NUCLEAR REGULATORY COMMISSION**

J. Beall	Senior Enforcement Specialist, Office of Nuclear Reactor Regulation (NRR)
R. Cooper	Director, Division of Reactor Projects
E. Conner	Project Engineer, Division of Reactor Projects (DRP)
J. Durr	Chief, Projects Branch No. 4, DRP
D. Holody	Enforcement Officer
J. Joustra	Senior Enforcement Specialist
R. Laura	Senior Resident Inspector
G. Morris	Electrical Engineer, Division of Reactor Safety (DRS)
W. Olsen	Resident Inspector
L. Prividy	Senior Reactor Engineer, Systems Section, DRS
J. Rogge	Chief, Reactor Projects Sections 4B, DRP
W. Ruland	Section Chief, Electrical Section, DRS

COPY OF PRESENTATION  
NORTH ATLANTIC ENERGY SERVICES COMPANY  
ENFORCEMENT CONFERENCE  
DECEMBER 5, 1994

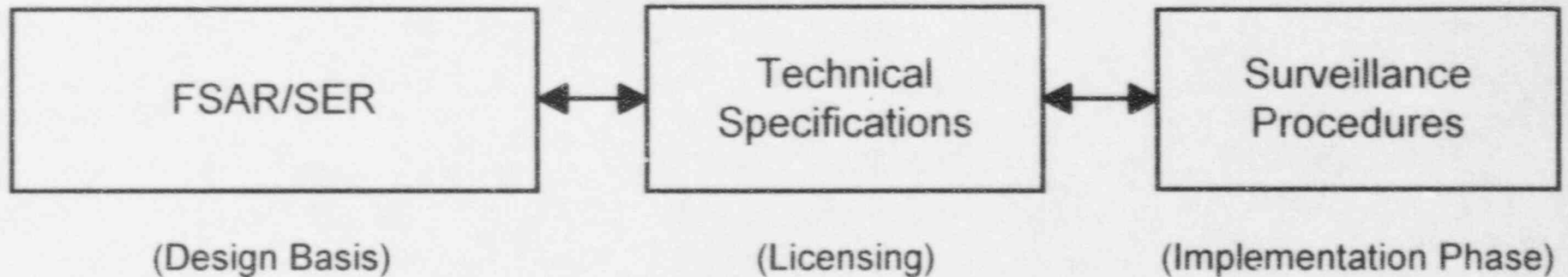
Enclosure 3

# SEABROOK STATION

## UNDervoltage RELAY

# CONFIGURATION MANAGEMENT

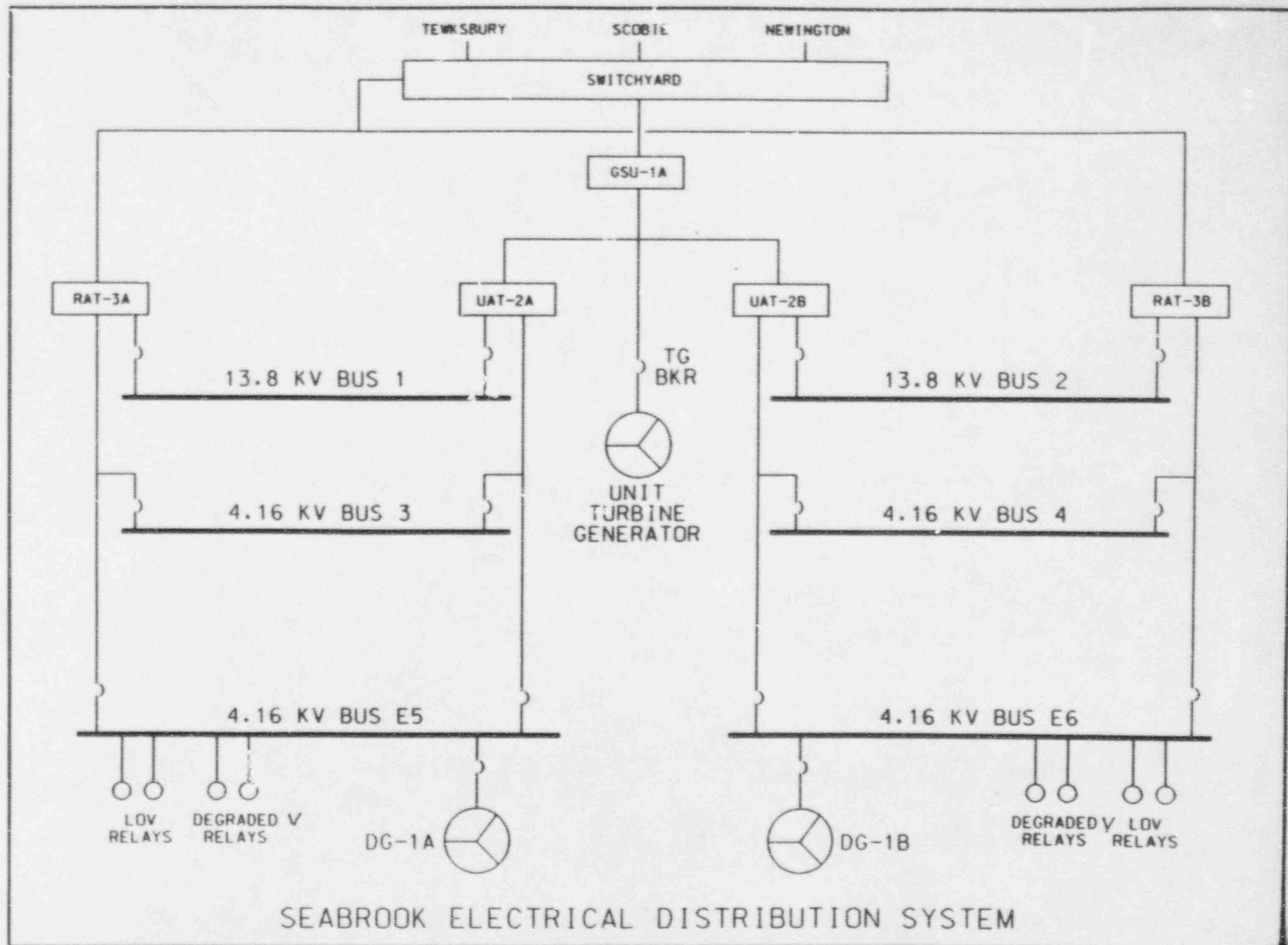
## Undervoltage Relay



- ◆ Regulatory Guides
- ◆ Codes and STDs
- ◆ Documentation (SER)

- ◆ Standard T/S
- ◆ "Customized" to Plant
- ◆ Minimize Changes to Facilitate Review and Maintain Consistency

- ◆ Generate Programs and Procedures Which are Consistent With FSAR/SER and Tech Specs.



# Technical Specification Attributes

## ◆ Design Number of Channels

<u>Total No. of Channels</u>	<u>Channel to Trip</u>	<u>Min. Channels Operable</u>	<u>Action</u>
<sup>2</sup> 4/bus	2/bus	<sup>1</sup> 3/bus	18

## ◆ Action Statement 18

With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the following conditions are satisfied:

- The inoperable channel is placed in the tripped condition within 1 hour, and
- The Minimum Channels OPERABLE requirement is met; however, one additional channel may be bypassed for up to 2 hours for surveillance testing of other channels per Specification 4.3.2.1.

## ◆ Testing Type/Frequency

	<u>Functional Test</u>	<u>TADOT</u>
Rev. 3	M	-
Rev. 4	-	R
Rev. 5	-	M

## Safety Significance

- ◆ Offsite Power: A highly reliable offsite power scheme with 3 transmission lines and a generator breaker.
- ◆ Redundancy: Only one train was tested at a time.
- ◆ Duration: The time to perform the test was relatively short when compared to the T.S. A.O.T of 72 hours for a DG and 8 hours for an Emergency Bus.
- ◆ Diversity: The diverse function of the Degraded Voltage Protection (with an SI) was still available.
- ◆ Awareness: Heightened awareness because of the "Trip Avoidance" nature of the test prevented undetectable failures.

The electrician was available the entire time so he would be able to restore the condition.

Therefore, it is concluded that this specific concern is of low safety significance.