

June 29, 1984

SBN- 676  
T.F.B.7.1.2



Public Service of New Hampshire

Director of Nuclear Reactor Regulation  
Attention: Mr. D. G. Eisenhut, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

- References:
- (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444.
  - (b) PSNH letter to NRC, SBN-556, dated 9/6/83.
  - (c) PSNH letter to NRC, SBN-576, dated 11/4/83.
  - (d) NUTAC letter to NRC (Griffing to Eisenhut), dated 9/15/83.
  - (e) NRC letter to NUTAC (Eisenhut to Griffing), dated 9/28/83.
  - (f) NUTAC letter to NRC (Griffing to Alexion), dated 3/23/84.

SUBJECT: Response to Section 2.2.2 of NRC Generic Letter 83-28.

Dear Sir:

References (b) and (c) confirmed that Public Service Company of New Hampshire (PSNH) was a participating member of the Nuclear Utility Task Action Committee (NUTAC) formed on September 1, 1983, for the specific purpose of defining an appropriate vendor interface program. In references (b) and (c), PSNH also committed to respond to Section 2.2.2 of Generic Letter 83-28 in June 1984, upon completion of the NUTAC work.

Reference (d) advised NRC of the formation and mission of the NUTAC and, in reference (e), NRC concurred with the NUTAC's mission and announced the appointment of an NRC Project Coordinator for these matters.

In March 1984, the NUTAC completed its work and published its report as INPO document 84-010, a copy of which was transmitted to NRC by reference (f).

The following paragraphs of this letter complete the PSNH response to Section 2.2.2 of Generic Letter 83-28.

PSNH, as a participating member, voted approval of the final NUTAC Report and endorses the logic and methodology of that program as its own response to the NRC regarding Section 2.2.2 of Generic Letter 83-28. Specific implementation items presented in the NUTAC Report are further discussed below and the PSNH position or status regarding each is clarified.

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REGARDING SECTION 4.1.1.1:NSSS Vendor Contact

PSNH has in place an active, ongoing, two-way technical bulletin system and necessary direct contact with its NSSS supplier.

NPRDS/SEE-IN

PSNH re-affirms that it is an active participant in both the NPRDS and SEE-IN programs. In its present status as a "Near Term Operating License" (NTOL) applicant, PSNH is preparing the engineering/test information for Seabrook systems and components for our initial submission of data to the NPRDS data base. PSNH presently used NPRDS data base information to assist in the preparation and planning activities now in progress at Seabrook Station.

When Seabrook begins commercial operation, PSNH will then fully participate in NPRDS, including the timely submission of failure reports and operating history.

The internal programs and procedures needed to receive, analyze, control and disseminate information for and from the NPRDS and SEE-IN program are under development. These internal programs and controls will be fully functioning three months prior to fuel load or, as noted above, at start of commercial operations.

It is the intent of PSNH to continue its active participation in the NPRDS and SEE-IN programs and to incorporate, as appropriate and reasonable, future revisions to these programs.

Other Vendors

In past and present circumstances PSNH has never hesitated to seek assistance and Equipment Technical Information (ETI) from vendors of safety-related equipment. PSNH will continue this practice as recommended in the NUTAC report and will also make appropriate reports in the NPRDS and SEE-IN programs.

Internal Handling of ETI

As noted above under the NPRDS and SEE-IN programs, the PSNH internal administrative programs and procedures are under development. These controls will provide for processing of incoming ETI such that the objectives outlined in the NUTAC report are achieved. These internal programs and controls will be fully functioning three months prior to fuel load, or by commercial operation as appropriate.

Internal Handling of Vendor Services

PSNH has internal programs and procedures that provide the internal control of vendor services. These controls include the provisions outlined in the NUTAC report and also provide that ETI furnished in conjunction with performance of vendor services is handled in the same manner as other incoming ETI.

REGARDING SECTION 4.1.1.2:

As noted above, it is the intent of PSNH to continue its active participation in the NPRDS and SEE-IN programs and to incorporate, as appropriate and reasonable, future revisions or enhancements to the programs. PSNH recognizes that incorporation of such enhancements could involve revisions to existing administrative programs or procedures or to training or other activities.

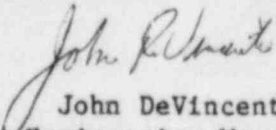
REGARDING SECTION 4.2.1:

As noted above, the PSNH internal programs and procedures will incorporate and achieve the guidance and recommendations of the NUTAC report, particularly those of Sections 3.1 and 4.1.1.1. Future revisions, found to be necessary as the result of extensive use, will be incorporated on a timely basis. Full implementation of existing programs by PSNH as an NTOL, however, will be achieved three months prior to fuel load, or by commercial operation as appropriate.

REGARDING SECTION 4.2.2.:

PSNH will incorporate enhancements to the existing programs as discussed under Sections 3.2 and 4.1.1.2. Such incorporation will be on a timely basis, consistent with our status as an NTOL and with a goal of overall implementation by January 1, 1986, or three months prior to fuel load, or 6 months after promulgation by INPC, whichever is latest.

Very truly yours,  
YANKEE ATOMIC ELECTRIC COMPANY

  
John DeVincentis  
Engineering Manager

JD/SDF:dh

cc: Mr. Tom Alexion, NRC Project Coordinator for Generic Letter 83-28,  
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Mr. George W. Knighton, Chief Licensing Branch No. 3, Division of  
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