

NYN-95087

October 30, 1995

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The Northeast Utilities System

Ted C. Feigenbaum Senior Vice President & Chief Nuclear Officer

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

Attention:

Document Control Desk

Reference:

- (a) Facility Operating License NPF-86, Docket No. 50-443
- (b) North Atlantic Letter NYN-95-056, "License Amendment Request 95-03: Revision to Technical Specification 3.4.6.2 Reactor Coolant System Operational Leakage Pressure Isolation Valve Table, (TAC No. M92959)", July 24, 1995, Ted C. Feigenbaum to USNRC
- (c) Telephone Discussion, A. De Agazio (NRC) and A. Legendre (North Atlantic), October 25, 1995

Subject:

Response to Request for Additional Information re: License Amendment Request 95-03

## Gentlemen:

North Atlantic Energy Service Corporation (North Atlantic) submitted License Amendment Request 95-03 on July 24, 1995, [Reference (b)]. License Amendment Request 95-03 proposed a change to the Seabrook Station Technical Specifications to relocate Table 3.4-1, "Reactor Coolant System Pressure Isolation Valves" from Technical Specification 3.4.6.2, "Reactor Coolant System Operational Leakage" to the Technical Requirements Manual. The NRC requested additional information regarding License Amendment Request 95-03 on October 25, 1995 [Reference (c)]. North Atlantic has enclosed, in response to the NRC request, a revised markup of Technical Specification page 3/4 4-23. The revised markup of Technical Specification page 3/4 4-23 includes a footnote which had initially been proposed to be relocated from Technical Specification Table 3.4-1 to the Technical Requirements Manual. The footnote will be maintained in the Technical Specifications per the guidance of NRC Generic Letter 91-08.

The proposed footnote on Technical Specification page 3/4 4-23 exempts the Residual Heat Removal (RHR) System pumps 8A and 8B suction isolation valves and their bypass check valves from Surveillance Requirement 4.4.6.2.2d (leakage testing within 24 hours of flow through the valve). Currently, Technical Specification Table 3.4-1 excepts the RHR suction isolation valves from Surveillance Requirement 4.4.6.2.2d. The RHR suction isolation valves bypass check valves included in the proposed footnote are two 1/2" check valves which are part of a design modification which will be installed during the upcoming refueling outage to address the pressure locking susceptibility for the RHR suction isolation valves. The RHR suction isolation valves bypass check valves will be subject to leakage testing in accordance with Surveillance Requirements 4.4.6.2.2a, b, c and e. It is proposed that the RHR suction isolation valves bypass check valves be excepted from the leakage testing requirement of Surveillance Requirement 4.4.6.2.2d due to the expectation that flow through the valves will not occur and if any flow does occur it will be a very small volume and not detectable to control room operators due to the passive design of the system. Compliance with Surveillance Requirement 4.4.6.2.2d is not practical for the RHR suction isolation valves bypass check valves, therefore the footnote exception from the requirement is proposed.

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Should you have any questions regarding this letter please contact Mr. James M. Peschel, Regulatory Compliance Manager at (603) 474-9521 extension 3772.

Very truly yours,

Ted C. Feigenbaum

TCF/ALL:sm Enclosures

cc:

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## **ENCLOSURE 1 TO NYN-95087**