



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 44 TO FACILITY OPERATING LICENSE NO. NPF-86

NORTH ATLANTIC ENERGY SERVICE CORPORATION

SEABROOK STATION, UNIT NO. 1

DOCKET NO. 50-443

1.0 INTRODUCTION

By application dated July 24, 1995, North Atlantic Energy Service Corporation (North Atlantic) proposed an amendment to the Appendix A Technical Specifications (TS) for the Seabrook Station, Unit 1 (Seabrook). The proposed amendment would delete Table 3.4-1, "Reactor Coolant System Pressure Isolation Valves" from TS section 3.4.6.2. Reference to Table 3.4-1 also would be deleted from Limiting Condition for Operation (LCO) 3.4.6.2 f and from Surveillance Requirement (SR) 4.4.6.2.2. North Atlantic supplemented the application by letter dated October 30, 1995. The supplement proposes to relocate the exceptions provided by the footnote on Table 3.4-1 to a footnote to SR 4.4.6.2d. The footnote provides exceptions from the requirements of SR 4.4.6.2.2d for the RHR Pump A and RHR Pump B Suction Isolation Valves. North Atlantic also proposed to extend the exceptions provided by the footnote to certain other valves.

The information contained in Table 3.4-1 would be relocated to the *Technical Requirements Manual* (TRM).

The October 30, 1995, letter provided a minor revision to the application but that revision does not change the initial proposed no significant hazards consideration determination. However, that letter also contained a proposed change that cannot be considered to be encompassed by the initial proposed no significant hazards consideration determination. This latter proposal is not being acted upon at this time pending the submittal of additional information from North Atlantic. This latter proposal also will be discussed in an appropriate Federal Register notice pursuant to 10 CFR 50.91.

2.0 EVALUATION

North Atlantic has proposed to delete Table 3.4-1 and any reference thereto from TS 3.4.6.2, and to relocate the listing of pressure isolation valves (PIV) to the TRM. The TRM is a North Atlantic controlled document that has been developed to hold requirements relocated from the TS. Revisions to the TRM are reviewed pursuant to 10 CFR 50.59, and summaries of changes are included with the periodic 10 CFR 50.59 report. North Atlantic asserts that relocating the table from the TS will eliminate the burden of processing license amendments when changes are made to PIV configurations and will facilitate the more effective utilization of NRC and North Atlantic resources.

On May 6, 1991, the Commission issued Generic Letter 91-08 (GL 91-08) relating to the issue of removing component lists from the TS. GL 91-08 stated in part:

This guidance includes the incorporation of lists into plant procedures that are subject to the change control provisions for plant procedures in the Administrative Controls Section of the TS.

The removal of component lists from TS permits administrative control of changes to these lists without processing a license amendment, as is required to update TS component lists. Any change to component lists contained in plant procedures is subject to the requirements specified in the Administrative Controls Section of the TS on changes to plant procedures. Therefore, the change control provisions of the TS provide an adequate means to control changes to these component lists, when they have been incorporated into plant procedures, without including them in TS.

Licensees and applicants planning to adopt the line-item improvement were encouraged to propose changes consistent with the guidance contained in the two enclosures with the GL. Specific issues identified in Enclosure 1 to GL 91-08 to be addressed with a request to remove component lists from the TS include:

- (1) an appropriate description of the scope of the components to which the TS requirements apply,
- (2) revision of the specifications to incorporate any modification of or exception to TS requirements that are provided by notes to the deleted component lists, and
- (3) confirmation that the lists of components removed from the TS are located in appropriately controlled plant procedures.

With regard to item (1) above, the TS requirement remaining after the deletion of Table 3.1-1 from LCO 3.4.6.2.f still would apply to any PIV. 10 CFR 50.2, 10 CFR 50.55a(c), and General Design Criteria 55 of 10 CFR 50, Appendix A, define Reactor coolant system (RCS) pressure isolation valves (PIVs) as any two normally closed valves in series within the reactor coolant pressure boundary, which separate the high pressure RCS from an attached low pressure system. Therefore, deletion of reference to Table 3.4-1 from LCO 3.4.6.2.f does not affect the scope of component to which the TS requirements apply.

North Atlantic's supplement to the amendment request, dated October 30, 1995, would incorporate, in accordance with item (2) above, the exceptions from the requirements of SR 4.4.6.2.2d for the RHR Pump A and RHR Pump B suction isolation valves provided by the footnote to Table 3.4-1 into a footnote to SR 4.4.6.2d. This exception would be extended to the RHR Pump suction isolation valve bypass check valves which are to be installed during the fourth refueling outage as part of a modification to preclude the potential for

pressure-locking of the isolation valves. However, North Atlantic did not provide a description of the modification, an analysis of the safety aspects of the proposed modification and extension of the SR exception, and an analysis of the issue of no significant hazards relating to the proposed change. Therefore, pending submittal of this information, the staff is not acting upon this portion of the proposed amendment.

With regard to item (3), North Atlantic is requested to confirm, prior to entry into Mode 4 from the fourth refueling outage, that the list of PIVs is located in the TRM.

The enclosure to GL 91-08 specifically addressed the issue of PIVs stating, "Guidance on removing from the TS the list of reactor coolant system pressure isolation valves is pending the NRC staff's resolution of generic concerns with existing lists for these valves. In the interim, licensees should not submit proposals to remove this list from the TS."

Explicit guidance on removal of lists of PIVs from the TS has not been issued by the Commission. However, in September 1992, the Commission issued NUREG-1441, "Standard Technical Specifications, Westinghouse Plants" (STS). The list of PIVs is not included in STS section 3.4.14, "RCS Pressure Isolation Valve (PIV) Leakage", and STS Basis section 3.4.14 indicates that PIVs are listed in the FSAR (or other document). Furthermore, STS SR 3.4.14.1 contains the identical performance requirement for PIV leakage as presently contained in the Seabrook TS LCO 3.4.6.2f, viz., "Verify leakage from each RCS PIV is equivalent to ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2215 psig and ≤ 2255 psig." North Atlantic asserts that the proposed change to TS 3.4.6.2 is administrative in that it merely relocates the PIV list from the TS to the TRM but maintains the requirements for PIV testing and the acceptance criteria for the testing in the Limiting Condition for Operation (LCO) 3.4.6.2(f).

The staff agrees with North Atlantic's assertion that the deletion of Table 3.4-1 does not alter any requirement with respect to PIVs. Furthermore, the staff finds that the deletion of Table 3.4-1 from the TS and relocation to the TRM is consistent with the STS. Therefore, the staff finds that this change is acceptable.

The staff finds acceptable the portion of the proposed footnote to SR 4.4.6.2.2d retaining the exception for the RHR Pump suction isolation valves. However, the staff is making no determination at this time regarding the acceptability of the proposal to extend the SR exception to the isolation valve bypass check valves. This proposal will be reviewed upon submittal of additional information.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Hampshire and Massachusetts State officials were notified of the proposed issuance of the amendment. The State officials had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes a surveillance requirement. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 45180). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: November 28, 1995