



Public Service of New Hampshire

New Hampshire Yankee Division

January 28, 1985

SBN-753

T.F. B7.1.2

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

Attention: Mr. George W. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing

- References:
- (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444
  - (b) USNRC Letter, Dated July 27, 1982, "Request For Additional Information", F. J. Miraglia to W. C. Tallman.
  - (c) PSNH Letter, Dated August 12, 1983, "Response to RAI-260.28 and Safety Evaluation Report Outstanding Issue #18", J. DeVincentis to G. W. Knighton
  - (d) USNRC Letter, Dated October 21, 1983, "Seabrook QA-List", G. W. Knighton to R. J. Harrison
  - (e) USNRC Letter, dated July 25, 1984, H. H. E. Plaine to B. L. Harshe

Subject: Response to RAI 260.28 and Safety Evaluation Report Outstanding Issue #18, Seabrook Q-List

Dear Sir:

Your letter of October 21, 1983 stated that the response to FSAR question 260.28 was acceptable except as noted in the attachment. The attachment listed several items which required pertinent requirements of the Quality Assurance Program to be applied to non-safety related equipment during the operations phase of Seabrook Station. We do not feel it is appropriate to apply the FSAR Quality Assurance Program to non-safety-related items unless the non-safety-related item is identified as having an obvious potential impact on a safety related structure, system, or component. You have not notified us, nor are we aware of any particular safety concerns associated with certain identified items. If a particularized safety showing is made, the item will be included in the scope of our FSAR Quality Assurance Program. [Please note paragraph three of Reference (e) (Attachment 2).]

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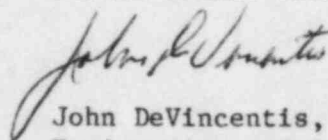
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During the operating phase of Seabrook Station, certain programmatic controls will be applied to selected non-safety-related items, which include the items identified in Reference (d). The programmatic controls are defined by program manuals which control specific activities at Seabrook Station and include such subjects as procurement and material control, radiation protection, training, test control, maintenance, design control, etc. These programmatic controls provide adequate guidance to relevant personnel responsible for the operation, maintenance, engineering or logistic support of Station equipment to insure that it is properly treated. Implementation of these programmatic controls will be verified by Quality Assurance personnel to the extent necessary to insure proper application.

Attachment 1 provides an item by item response to the staff exceptions to the Seabrook Q-List provided by Reference (d).

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



John DeVincentis, Director  
Engineering and Licensing

JD/WJH/cjb

Attachments (4)

cc: Atomic Safety and Licensing Board Service List

Staff Exceptions to Seabrook QA-List

- A. Response to the 260.28 items listed below indicates they are "not safety-related and will not be included in the OQAP." Our position is that these items should be subject to the pertinent requirements of the Operational FSAR QA program because they are safety-related. In order to prevent an impasse on terms, we will only require of the applicant a commitment to apply the pertinent requirements of the OQAP during the operations phase.
- a.6 Containment building polar crane
  - a.7 Cask handling crane
  - a.8 Spent fuel pool liner
  - a.13 Refueling machine
  - a.14 Spent fuel pool bridge and hoist
  - a.21 Intake and discharge structures (part of UHS)
  - c.7 Emergency lighting battery packs
  - f.20 Emergency support facilities
  - f.21 Inplant I<sub>2</sub> radiation monitoring

Response

The above items are not safety related and will not be included under the OQAP. However, programmatic controls will be applied to the above items. The actual implementation of these controls will be defined by the program manuals used to control specific activities at Seabrook Station.

The spent fuel pool liner is not safety related and not covered by the OQAP. However, any backfits, repairs, or modifications to the liner will be conducted under the OQAP.

- B. The response to 260.28 Items b.1-5 adds note 15 in Table 3.2-2 to a number of the items, but not to the items listed below. Our position is that Note 15 should also be added to these items:
- b.1 Diesel Generator Cooling Water Systems
    - (a) Auxiliary coolant pumps
    - (b) All remaining on-engine equipment and piping
  - b.3 Diesel Generator Lubrication Systems
    - (a) Auxiliary lube oil pumps
  - b.4 Diesel Generator Combustion Air Intake
    - (a) Silencers (needs listing with Note 15)
  - b.5 Diesel Generator Fuel Oil Storage and Transfer Systems
    - (a) All remaining on-engine equipment and piping

Response

The diesel generator auxiliary coolant pumps and auxiliary lube oil pumps are not safety related and are not necessary for safe operation of the diesel generators and as such, will not be covered by the OQAP. However, programmatic controls will be applied to these items. The actual implementation of these controls will be defined by the program manuals used to control specific activities at Seabrook Station.

Seabrook Station does not utilize intake silencers on its diesel generators. Reference (c) added Note 15 for the exhaust silencers.

Note 15 will be added to Diesel Generator Cooling Water System remaining on-engine equipment and piping and the Diesel Generator Fuel Oil Storage and Transfer System remaining on-engine equipment and piping.

Note 15 is revised to read as follows: "Non-safety class equipment and piping essential for diesel generator operation will be subject to pertinent requirements of the OQAP.

- C. Note 6 to Table 3.2-1 excludes some components of the diesel packages. Our position is that the excluded components are back-ups and therefore are essential. They should be subject to the pertinent requirements of the OQAP during the operations phase.

Response

Note 6 to Table 3.2-1 excludes specifically the electric motors for the auxiliary coolant pumps and the auxiliary lube oil pumps. These components are not safety related and are not necessary for safe operation of the diesel generators and as such, will not be covered by the OQAP. However, programmatic controls will be applied to these items. The actual implementation of these controls will be defined by the program manuals used to control specific activities at Seabrook Station.

- D. Response to Item 260.28.c.2 indicates that instrumentation, control and power cables have been added to Table 3.2.-1. This is acceptable except that the cables are limited to those "associated with ESF." This limitation should be deleted since all such cables should be subject to the pertinent requirements of the OQAP during the operations phase.

Response

Instrumentation, control, and power cables used in Class IE circuits, including Class IE underground cable systems and cable splices, will be subject to the requirements of the OQAP.

Instrumentation, control, and power cables used in non-class IE applications will not be covered by the OQAP. However, programmatic controls will be applied to these items. The actual implementation of these controls will be defined by the program manuals used to control specific activities at Seabrook Station. Chapter 8 of the Seabrook Station FSAR will be amended to clarify this commitment. Attachment 4, showing the changes to Chapter 8, is provided for your information. The formal submittal of these changes will be included in a future FSAR amendment.

- E. Response to Item 260.28c.3 refers to Note 5 (Table 3.2-1). Note 5 needs clarification to indicate that all conduits, cable trays, raceways, and their supports at Seabrook will be subject to the pertinent requirements of the OQAP during the operations phase.

Response

Reference (b) requested that conduit and cable trays containing Class IE cables and their supports and raceway installations whose failure during a seismic event could damage other safety related systems or components be added to Table 3.2-1. Reference (c) complied without exception to your request.

Non-safety related conduits, cable trays, raceway systems and their supports containing non-Class IE cables, whose failure during a seismic event will not effect safety related structures, systems or components will not be included under the OQAP. However, programmatic controls will be applied to the above items. The actual implementation of these controls will be defined by the program manuals used to control specific activities at Seabrook Station.

- F. The response to Item 260.28.c.6 regarding containment penetrations includes reference to Note 7 which indicates that protection for some penetrations are exceptions which, presumably, implies that this protection (circuit breakers) will not be subject to the pertinent requirements of the OQAP during the operations phase. Our position is that they should be. In addition, since credit for mitigating the consequences of accidents is taken for all class IE and non-class IE onsite power systems (Item D.2 of Table 3.2-1), our position is that all these systems should be subject to the pertinent requirements of the OQAP during the operations phase. Therefore, limiting parenthetical notes to Item D.2 of Table 3.2-1 (such as ESF Buses, associated with ESF, etc.) should be deleted.

Response

All containment electrical penetration assemblies, both Class IE and non-Class IE, including primary and backup fault current protective devices, except the 13.8 kV circuit breakers, will be covered by the OQAP.

The 13.8 kV circuit breakers as discussed in the FSAR, Section 8.3.1.1.a4, are not class IE, but are controlled by the Seabrook Station Technical Specifications for periodic surveillance testing required to meet RG1.63. This position has been accepted by the NRC. See SER Section 8.3.3.6.3.

The 13.8 kV circuit breakers will be subject to administrative controls. The actual implementation of these controls will be defined by the program manuals used to control specific activities at Seabrook Station.

No credit is taken at Seabrook Station for non-Class IE onsite power systems mitigating the consequences of an accident. Therefore, the non-Class IE onsite power systems will not be covered under the OQAP and the parenthetical notes to Item D.2 of Table 3.2-1 will not be deleted. However, programmatic controls will be applied to the non-Class IE onsite power systems. The actual implementation of these controls will be defined by the program manuals used to control specific activities at Seabrook Station.

- G. The response to Item 260.28.d does not provide the required commitment that the modifications will be subject to the pertinent requirements of the OQAP during the operations phase. Our position is that they should be.

Response

Modifications of the site and roof drainage systems, the seawall, retaining walls, and other revetments surrounding the plant will be evaluated to determine if their implementation will increase the flood vulnerability of safety related items. Those modifications determined to affect safety related items will be covered by the OQAP.

Modifications to the above items determined not to affect safety related items will not be covered by the OQAP. However, programmatic controls will be applied to these modifications. The actual implementation of these controls will be defined by the program manuals used to control specific activities at Seabrook Station.

- H. The response to Item 260.28.e refers to Item D.1 in Table 3.2-1. We have no assurance that D.1 in Table 3.2-1 is a complete list, and we reiterate the item.

Response

Safety-related instrumentation and controls (I&C) described in Sections 7.1 through 7.6 of the FSAR plus safety-related I&C for safety-related fluid systems will be subject to the pertinent requirements of the FSAR QA program.

- I. The response to Item 260.28.f.4 indicates that post-accident sampling capabilities are NNS. Our position is that the post-accident sampling system is provided in order to mitigate the consequences of an accident and that it should be subject to the pertinent requirements of the OQAP during the operations phase.

Response

Neither Enclosure 2 nor Enclosure 3 of NUREC-0737 identifies the Post-Accident Sampling System (PASS) as a safety related system. The PASS is a passive system and provides no active mitigating function during or after an accident. The PASS panel and pumps have been added to FSAR Table 13.2-2 and FSAR Section 9.3.2 describes the PASS and its function.

The system is classified as a non-nuclear safety system and as such will not be covered by the OQAP. However, programmatic controls will be applied to the system. The actual implementation of these controls will be defined by the program manuals used to control specific activities at Seabrook Station.

- J. Item 260.28.f.15 was inadvertently omitted. This item is "Automatic trip of reactor coolant pumps," NUREG-0737 Item II.K.3(5). Provide a commitment that this action will be subject to the pertinent requirements of the OQAP during the operations phase or justify not doing so.

Response

Item 260.28.f.15, "Automatic Trip of Reactor Coolant Pumps" was deleted in response to NRC Generic Letter 83-10C. This item is discussed in our letter SBN-498 dated April 8, 1983, J. DeVincentis to D. G. Eisenhut (Attachment 3), in response to NRC Generic Letter 83-10C.

- K. Regarding Item 260.28.f.16, the fact that the derivative function has been deleted from the PID controller should be documented and verified. Confirm that this is the case.

Response

Item 260.28.f.16, the "derivative function", has been deleted from the PID controller by setting the derivative feature to zero. A discussion of this item is included in our letter SBN-498 dated April 8, 1983, J. DeVincentis to D. G. Eisenhut (Attachment 3). Response to NRC Generic Letter 83-10C.

- L. Regarding item 260.28.f.19, the fact that the Radiological Emergency Plan is audited as required by the Technical Specifications is inadequate without a commitment that such auditing is performed in accordance with the OQAP (i.e., Regulatory Guides 1.144 and 1.146, etc.). A response similar to the response to Item 260.28.h would be acceptable.

Response

The Radiological Emergency Plan will be included in the Audit Program that is described in FSAR Section 17.2.18.2.





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

Attachment 2  
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July 25, 1984

Bruce L. Harshe, Chairman  
Utility Safety Classification Group  
801 18th Street, N.W.  
Suite 300  
Washington, D. C. 20006

Dear Mr. Harshe:

I have been asked by the Commission to reply to your letter of June 14, 1984, written on behalf of the Utility Safety Classification Group (USCG). You requested the Commission to address the NRC staff's establishment of a class of equipment identified as "important to safety" but not "safety-related." You stated that this new classification of equipment is not supported by an articulated safety concern, is contrary to NRC practice and has been established without rulemaking. For these reasons, you asked that the safety classification issue be dropped from further consideration in ongoing proceedings until the Commission achieves a generic resolution of the safety classification issue.

The Commission recently addressed the issue of equipment classification in its Memorandum and Order of June 6, 1984, CLI-84-9, copy attached. In that Order, the Commission: (1) acknowledged the current state of uncertainty regarding the classification of equipment; (2) announced its intention to initiate a rulemaking proceeding on the classification issue; and (3) authorized the Boards to proceed in the interim on a case-by-case basis in accordance with recent precedent, i.e., to consider on the basis of a particularized showing of clearly identified safety concerns whether a piece of equipment that is not safety-related has a function "important to safety."

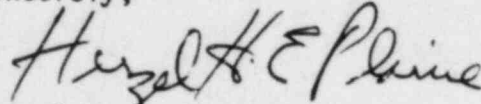
CLI-84-9 goes a long way towards responding positively to your concerns. The Commission will consider generically the issue of equipment classification and has required participants to proceedings, including the NRC staff, to make particularized safety showings to support any claims that specific items of equipment that are not safety-related should be categorized as important to safety.

Under these circumstances, the Commission believes that it is not necessary now to go beyond CLI-84-9. Rather the appropriate next step in addressing the issue of equipment qualification is the initiation of a rulemaking proceeding. A petition for rulemaking, such as that which you reported is being prepared by the USCG, would be one way to initiate that proceeding. While such a petition is not necessary to initiate Commission action, it might be helpful to the NRC staff by laying out USCG's position.

~~84-849-102~~

The Commission appreciates your comments on this issue and expects that the USCG will participate actively in the forthcoming rulemaking to ensure that an appropriate classification scheme is developed.

Sincerely,



Herzel H. E. Plaine  
General Counsel

Attachment:  
CLI-84-9