North Atlantic
Energy Service Corporation

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Ted C. Feigenbaum
Senior Vice President and
Chief Nuclear Officer

NYN-92123

September 18, 1992

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

Attention: Document Control Desk

References:
(a) Facility Operating License No. NPF-86, Docket No. 50-443

(b) USNRC Letter dated August 20, 1992, "Seabrook Inspection 50-443/92-13," J. C. Linville to T. C. Feigenbaum

(c) North Atlantic Letter dated July 17, 1992, "Licensee Event Report (LER) 92-07-00: Non-compliance With Technical Specification 3.8.1 Action Requirements," T. C. Feigenbaum to USNRC

Subject: Reply to a Notice of Violation

Gentlemen:

In accordance with the requirements of the Notice of Violation contained in Reference (b), the North Atlantic Energy Service Corporation (North Atlantic) response to the cited violation is provided as Enclosure 1.

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

Very truly yours,

Ted C Feigenbaum

Ted C. Feigenbaum

TCF:TGP/act
Enclosure

JE01 1/1

STATE OF NEW HAMPSHIRE

Rockingham, ss. September 18, 1992

Then personally appeared before me, the above-named Ted C. Feigenbaum, being duly sworn, did state that he is Senior Vice President and Chief Nuclear Officer of the North Atlantic Energy Service Corporation that he is duly authorized to execute and file the foregoing information in the name and on the behalf of North Atlantic Energy Service Corporation and that the statements therein are true to the best of his knowledge and belief.

Beverly E Silloway
Beverly E. Silloway, Notary Public
My Commission Expires: February 28, 1995

cc: Mr. Thomas T. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
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Mr. Gordon E. Edison, Sr. Project Manager
Project Directorate I-3
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Washington, DC 20555

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ENCLOSURE TO NYN-92123

REPLY TO A NOTICE OF VIOLATION

Violation

During an NRC inspection conducted on June 16 - July 27, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

A. Technical Specification 3.8.1.1.c.1 requires that when an emergency diesel generator is inoperable, all required systems that depend on the remaining operable emergency diesel generator as a source of emergency power must be operable.

Contrary to the above, on June 17, after Emergency Diesel Generator B was declared inoperable, calibration of a pressure instrument was approved which caused the A train of the Containment Enclosure Emergency Air Cleanup system, which depends on Emergency Diesel Generator A as a source of emergency power, to be inoperable.

This is a Severity Level IV violation.

B. Technical Specification 3.8.1.1.a requires that, within 24 hours of an emergency diesel generator being declared inoperable, the remaining emergency diesel generator be started from ambient conditions per Technical Specification surveillance requirement 4.8.1.1.2a.5.

Contrary to the above, on June 18, 1992 at approximately 5:00 a.m., 24 hours after declaring Emergency Diesel Generator B inoperable, Emergency Diesel Generator A had not been started from ambient conditions per Technical Specification surveillance requirement 4.8.1.1.2a.5.

This is a Severity Level IV violation.

Reason for the Violation

These events were discussed in Reference (c), Licensee Event Report (LER) No. 92-07-00. North Atlantic has determined that the root cause of the two violations are as follows:

Violation A
The cause of this event was determined to be personnel error. Specifically, there was inadequate communication between an I&C technician and the Work Control Coordinator. The technician performing the procedure realized that the fan would become inoperable but, during the pre-job briefing he was not successful in communicating this to the individual responsible for controlling work in the plant. In addition, the lack of adequate procedural guidance contributed to the event. The procedure IS1624.327, "P-5027 Charging Pump Room Return Duct Pressure - Train A," used to calibrate the pressure switch did not state that performance of the procedure would remove the ability of the fan to automatically start, thereby causing the fan to be considered inoperable.

3. A Training Development Request (TDR) will be submitted to request training regarding disablements of automatic functions for Engineered Safety Features equipment. The TDR is scheduled to be submitted to Training by October 12, 1992.

4. A review will be performed of Technical Clarification 145, "EAH and CBA System Components Required to be OPERABLE in MODES 1-4," to determine if additional guidance is required regarding the automatic start feature for fans EAH-FN-180A and EAH-FN-180B. This review is scheduled to be completed by October 12, 1992.

5. A Technical Clarification will be developed to list the systems that must be reviewed for OPERABILITY per Technical Specification 3.8.1.1, ACTION c.1 when an EDG is determined to be inoperable. This Technical Clarification is scheduled to be issued by April 1, 1993.

Date of Full Compliance

The immediate corrective actions taken by North Atlantic for Violations A and B resulted in compliance with Technical Specifications 3.8.1.1.c.1 and 3.8.1.1.a respectively. Additionally, the long term corrective actions described above will ensure continued compliance with these Technical Specifications.

Violation B

The cause of this event was determined to be personnel error. Specifically, there was an inadequate shift turnover briefing due to miscommunication. The requirement to complete the surveillance for the "A" train EDG was verbally communicated to the oncoming shift but it was not recorded on the shift turnover briefing sheet.

Corrective Action

[illegible] ry of the two violations, self-identified by the Shift Superintendent for Violation [illegible] ncoming operating crew for Violation B, the following immediate actions were [illegible]

1. Violation A - The Shift Superintendent directed the maintenance workers to restore the "A" train of Containment Enclosure Emergency Air Cleanup System (EAH) fan to operable status.

2. Violation B - Upon notification by the oncoming operations crew, the Shift Superintendent directed the control room operators to conduct the surveillance, and entered Technical Specification 3.0.3, "Limiting Conditions for Operations," which requires the plant to be placed in Hot Standby within the next six hours. The operators completed the diesel generator surveillance within 30 minutes and exited Technical Specification 3.0.3 without initiating a plant shutdown.

3. The Plan of the Day (POD) process was revised to ensure that work activities not completed during their assigned system week are either postponed to the next week when the affected train is removed from service or are reviewed to ensure they can be worked in the opposite train system week without adversely affecting train operability.

4. The Operations Manager reviewed the events with the Operations shift personnel to emphasize close scrutiny of non-technical specification work items for their effect on systems required by the Technical Specifications, diligent tracking of action requirements and written discussion on turnover notes.

Corrective Actions to Prevent Recurrence

North Atlantic's long term corrective actions will include the following:

1. A review will be performed of the applicable Instrumentation & Control (I&C) procedures to determine if sufficient guidance is contained in the procedures to address Technical Specification Limiting Conditions for Operation and the entry into ACTION statements during maintenance activities. This review is scheduled to be completed by January 30, 1993.

2. The method utilized by Control Room personnel to track and schedule event driven surveillance requirements will be reviewed to determine if a revision can be made to provide enhanced tracking capability. This review is scheduled to be completed by January 15, 1993.