

**North
Atlantic**

North Atlantic Energy Service Corporation
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The Northeast Utilities System

May 27, 1997

Docket No. 50-443
NYN-97057

United States Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, D.C. 20555

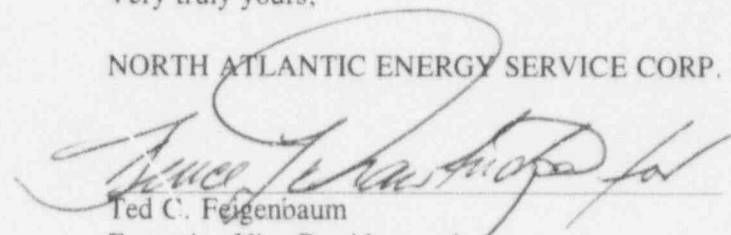
Seabrook Station
Licensee Event Report (LER) 97-007-00
Environmental Protection Program Non-Compliance

Enclosed, please find Licensee Event Report (LER) No. 97-007-00 for Seabrook Station which was identified on April 25, 1997. This event is being reported pursuant to Section 2.G of the Seabrook Station Facility Operating License No. NPF-86.

Should you require further information regarding this matter, please contact Mr. Terry L. Harpster, Director of Licensing Services, at (603) 773-7765.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.


Ted C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer

cc: H. J. Miller, Regional Administrator
A. W. De Agazio, NRC Project Manager, Seabrook Station
J. B. Macdonald, Senior Resident Inspector, Seabrook Station

INPO
Records Center
700 Galleria Parkway
Atlanta, GA 30339

9706020302 970527
PDR ADOCK 05000443
S PDR



300070

LICENSEE EVENT REPORT (LER)

(See reverse for required number of
digits/characters for each block)ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY
INFORMATION COLLECTION REQUEST: 60.0 HRS. REPORTED LESSONS
LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED
BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN
ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-
6, F35), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC
20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104),
OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Seabrook Station

DOCKET NUMBER (2)

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PAGE (3)

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TITLE (4)

Environmental Protection Program Non-Compliance

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
04	25	97	97	007	00	05	27	97	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
POWER LEVEL (10)		100	20.2201(b)		20.2203(a)(2)(v)		50.73(a)(2)(i)		50.73(a)(2)(viii)	
			20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)	
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71	
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		<input checked="" type="checkbox"/> OTHER	
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A	
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)			

LICENSEE CONTACT FOR THIS LER (12)

NAME

Allen L. Legendre, Jr., Nuclear Licensing Supervisor

TELEPHONE NUMBER (Include Area Code)

(603) 773-7773

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).		NO		EXPECTED SUBMISSION		MONTH	DAY	YEAR
		<input checked="" type="checkbox"/>						

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 25, 1997, during the preparation of the 1996 Annual Environmental Operating Report, it was discovered that North Atlantic was not in compliance with the requirements of Appendix B to the Facility Operating License (FOL) for Seabrook Station, Environmental Protection Plan (EPP). In accordance with the requirements of Section 2.G of the FOL, an initial notification was made to the NRC Operations Center via the Emergency Notification System on April 25, 1997. Three deficiencies of the EPP were identified in that notification.

The causes of this event are attributed to: 1) Lack of commitment to program implementation, 2) Insufficient programmatic detail, and 3) Inadequate program monitoring or management. Corrective actions include: 1) Establish an Environmental Protection Program that coordinates and controls the various environmental subprograms, 2) Designate responsibility for the implementation of the Environmental Protection Program, 3) Reexamine and improve the Environmental Protection Plan subprogram implementation details and management expectations, and 4) Increase the frequency and rigor of self-assessment and independent oversight of the EPP.

There were no adverse safety consequences nor were there adverse non-radiological environmental impacts as a result of this event. This is the first event of this type at Seabrook Station.

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

I. Description of Event

On April 25, 1997, during the preparation of the 1996 Annual Environmental Operating Report, it was discovered that North Atlantic was not in compliance with the requirements of Appendix B to the Facility Operating License (FOL) for Seabrook Station, Environmental Protection Plan (EPP). In accordance with the requirements of Section 2.G of the FOL, an initial notification was made to the NRC Operations Center via the Emergency Notification System on April 25, 1997. Three deficiencies of the EPP were identified in that notification. North Atlantic has identified the following violations in its implementation of the EPP:

1. The EPP permits North Atlantic to make changes in Station design, or operation, or perform tests or experiments affecting the environment as long as the activities do not involve an unreviewed environmental question and do not involve a change in the EPP.

Contrary to the requirements, North Atlantic procedure and design review programs are deficient in conducting such evaluations. While design changes are evaluated against a limited set of environmental criteria in accordance with the Design Control Manual, not all the criteria required by the EPP are addressed. Further, the review of new procedures, procedure revisions or manual revisions did not include a determination of whether the procedure or revisions constituted an unreviewed environmental question or change to the EPP.

2. The EPP requires that any occurrence of an unusual or important event that indicates, or could result in, significant environmental impact causally related to plant operation be recorded and reported to the NRC within 24 hours and followed by a written report within 30 days. For events reportable to other agencies, the NRC must be provided a copy of the report at the time that it is submitted to another agency.

Contrary to the requirements, North Atlantic: 1) did not notify the NRC within 24 hours of the harbor seal impingements which have occurred from 1993 to the present, and 2) did not provide copies to the NRC of the reports sent to the National Marine Fisheries Service (NMFS). The impingement of harbor seals by Seabrook Station, on a number of occasions beginning in 1993, are violations of the Marine Mammal Protection Act and are considered important events. The impingements were reported to the NMFS (telephonically prior to 1995 and in writing beginning in 1995).

3. The EPP requires that a copy of a proposed change to the NPDES permit be provided to the NRC at the same time that it is sent to the permitting agency and that changes to the NPDES permit be reported to the NRC within 30 days of their approval.

Contrary to these requirements, on January 13, 1995, North Atlantic requested a change to the NPDES permit to allow the use of methoxypropylamine (MPA), a secondary chemistry control agent, and did not provide a copy to the NRC. In addition, when the permit was granted by the EPA on April 13, 1995, a copy of the change approval was not submitted to the NRC.

II. Cause of Event

The cause of this event, as determined by a root cause analysis, was a result of the following:

1. Lack of commitment to program implementation.

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

The attention to the implementation of the EPP has experienced varying degrees of management commitment and attention since the FOL was issued. The changes to the organizational structures and program expectations have negatively impacted management's attention to the EPP.

2. Insufficient programmatic detail.

There is a lack of a clear, unambiguous set of environmental program implementing procedures which provide clear guidance within the environmental programs and proceduralized interfaces with other programs. For example, references are needed to other programs to ensure that an environmental impact evaluation is performed whenever a facility design or operation change potentially impacts the environment. This has lead to a lack of consistent interpretation of the EPP requirements. North Atlantic lacked an "umbrella" EPP document to provide overall coordination, design and direction between the various environmental program elements. Also, the North Atlantic staff had no specific program leader that was recognized for consistent guidance and ultimate direction.

3. Inadequate program monitoring or management.

There is a lack of consistent programmatic improvement due to the lack of self-assessment practices and the lack of consistent and formal monitoring mechanisms.

III. Analysis of Event

No adverse nuclear safety consequences resulted from this event. No violations of the Technical Specifications are involved in this event. The EPP provides for the protection of non-radiological environmental values during the operation of the plant.

No adverse non-radiological environmental impact due to station activities was determined to have occurred. While a number of NPDES permit exceedances have been documented, these were not due to a change in plant design or operation and did not result in any significant environmental impact.

IV. Corrective Action

On May 7, 1997, an article in a Seabrook Station publication available to all employees alerted personnel that until programs are revised, personnel who make changes to Seabrook Station through either the design change program or the procedure revision program need to assess whether the change may significantly affect the environment.

On May 14, 1997, the NRC was sent copies of the correspondence with the NMFS, EPA and the New Hampshire Department of Environmental Services concerning the seal impingements and the change to the NPDES permit.

North Atlantic will take the following corrective actions:

1. Establish an EP Program that coordinates and controls the various environmental subprograms.
2. Designate responsibility for the implementation of the EP Program.
3. Reexamine and improve the EPP subprogram implementation details and management expectations.

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		97	--	007	-- 00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

4. Increase the frequency and rigor of self-assessment and independent oversight of the EPP.

V. Additional Information

Similar Events

A review of the Seabrook Licensee Event Reports did not identify a similar event involving the EPP.

Manufacturer Data

None