



# Public Service of New Hampshire

New Hampshire Yankee Division

March 4, 1986

SBN-956 T.F. 34.2.99

United States Nuclear Regulatory Commission Washington, DC 20555

Attention: Mr. Vincent S. Noonan, Project Director

PWR Project Directorate #5

References: (a) Construction Permit CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444

(b) USNRC Letter, dated June 18, 1985, "Request for Additional Information Following Preliminary Staff Review of PSNH Response to Generic Letter 83-28," G. W. Knighton to R. J. Harrison

Subject: Additional Information Regarding Generic Letter 83-28, Items 4.5.2 and 4.5.3

Dear Sir:

In response to the referenced request for additional information, enclosed please find our response to items 4.5.2 and 4.5.3.

This submittal concludes our response to all requests for information described in Reference (b).

Very truly yours,

George S. Thomas

GST/cjb

Enclosure

cc: ASLB Service List

8603110423 860304 PDR ADOCK 05000443 A PDR A055

#### Enclosure to SBN-956

# Item 4.5.2

Applicant needs to state if his plant is currently designed to permit on-line testing of the RTS. If not, either design modifications that will permit such testing shall be described along with an implementation schedule or justification for not providing on-line testing capability shall be provided.

### Response

The Seabrook Station reactor trip system is designed to permit on-line testing.

### Item 4.5.3

Applicant needs to supply results of review of existing or proposed intervals for on-line testing considering the concerns of 4.5.3.1 to 4.5.3.5 in the generic letter. Proposed Technical Specification changes resulting from this review shall be submitted for review.

## Response

Seabrook Station is not an operating facility and as such does not have active Technical Specifications and thus, no on-line testing history. We expect to receive the Proof and Review copy of the proposed Seabrook Technical Specifications in early March 1986. These proposed specifications contain all of the on-line functional testing requirements of Generic Letter 85-09. Based upon these proposed requirements we offer the following:

- 4.5.3.1 and 4.5.3.2 The Westinghouse Owners Group (WOG), of which we are a member, is conducting tests in this area. As such, we will evaluate the results of the testing when completed and propose changes at that time if necessary.
- 4.5.3.3 1 e reduced redundancy during testing required by Generic Letter 85-09 will only account for a period of about two hours per month. As such, this is a very small percentage of actual operating time. WOG test results will be reviewed and appropriate changes proposed if necessary.
- 4.5.3.4 The WOG designed testing system of the RTS should improve availability and reduce operator error during testing as no jumpers or lifted leads are required.
- 4.5.3.5 Component "wear-out" caused by testing cannot be accurately evaluated since we have no operating test history. Generic Letter 85-09 requirements will add an additional 24 cycles each year to the trip breakers. We do not anticipate that this additional cycling will significantly degrade the trip breakers. WOG results of life cycle testing and component wear out will be reviewed and appropriate changes proposed if necessary.

An indepth review of the on-line testing requirements of Generic Letter 85-09 will be conducted during the review stage of the Seabrook Station Technical Specifications. Any changes resulting from this review will be discussed with the staff at that time. Any changes resulting from the WOG testing results will be discussed with the staff when they become available.