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MEMORANDUM FOR: Hugh L. Thompson, Jr., Director
Division of PWR Licensing - A
Office of Nuclear Reactor Regulation

FROM: Richard W. Starostecki, Director
Division of Reactor Projects, Region I

SUBJECT: SEABROOK STATION - LICENSING REVIEW AND UPDATE OF
SER INPUT

In accordance with my memorandum to you dated February 4, 1986, Region I has conducted a licensing review on the following Seabrook SER Section 13.5.1 open items:

- 1) I.A.1.2 - Shift Supervisor Responsibility
- 2) I.C.2 - Shift Turnover Procedures
- 3) I.C.3 - Shift Supervision Responsibility
- 4) I.C.4 - Control Room Access
- 5) I.C.5 - Feedback of Operating Experience
- 6) I.C.6 - Verification of the Correct Performance of Operating Activities

This licensing review is enclosed as input for the next SER Supplement. As is indicated in the review, two items, I.C.5 and I.C.6 have been identified as confirmatory and should be included in Section 1.8.

Continued coordination of the subject Region I support activities can be accomplished through the responsible Section Chief for Seabrook, R. M. Gallo (488-1234).

Original Signed By:

Richard W. Starostecki, Director
Division of Reactor Projects

Encl.

cc:

V. Noonan, NRR
V. Nerses, NRR
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bcc:

Gallo
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memo for Hugh L. Thompson, Jr.,
Director

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13.5.1 Administrative Procedures

NUREG 0660 (TMI Action Plan) and NUREG 0737 (Clarification of TMI Action Plan Requirements) required that procedures be written and approved to implement the following items:

- I.A.1.2 Shift Supervisor Responsibility
- I.C.2 Shift Turnover Procedures
- I.C.3 Shift Supervision Responsibility
- I.C.4 Control Room Access
- I.C.5 Feedback of Operating Experience
- I.C.6 Verification of Correct Performance of Operating Activities

The SER issued in March, 1983 indicated that final acceptance of the applicant's commitment to implement the above NUREG items was subject to approval of the facility's proposed Technical Specifications (T.S.) and the acceptance of the clarifications to R.G. 1.33, Revision 2, February 1978, stated in Appendix A of FSAR Chapter 17. The applicant referenced these two documents in describing the administrative procedures. The applicant committed to implement the NUREG items in Section 13.5.1.3 (entitled "Procedure Description") of Amendment 45 to the FSAR. Each item is addressed individually below. Paragraph numbers refer to paragraphs within section 13.5.1.3.

I.A.1.2 Shift Supervisor Responsibility

This item requires that the non-safety duties of the shift supervisor be delegated to non-licensed personnel on shift. Paragraph 2 entitled "Responsibility and Authority of Operating Personnel" commits to address I.A.1.2, in an administrative procedure.

I.C.2 Shift Relief and Turnover Procedures

This item requires formalization of shift relief procedures including implementation of a shift turnover check list. Paragraph 4 entitled "Operating Orders" commits to address the requirements of I.C.2.

I.C.3 Shift Supervision Responsibilities

This item requires that the responsibilities for both supervisors and operators be clearly defined. Paragraph 2, entitled "Responsibility and Authority of Operating Personnel" commits to fulfill this requirement in an administrative procedure.

I.C.4 Control Room Access

This item requires that the authority be established for limiting access to the control room to those essential personnel required for safe power plant operation. Paragraph 4, entitled "Operating Orders" commits to developing administrative procedures to address I.C.4.

I.C.5 Feedback of Operating Experience

This item gives detailed steps on how the applicant shall prepare procedures to assure that operating information pertinent to plant safety originating both within and outside the utility organization is continually supplied to operators and other personnel and is incorporated into training and retraining programs. NUREG 0737 clarifies this position to emphasize the assessment, screening, prioritization and prompt distribution of this information. Paragraph 2, entitled "Responsibility and Authority of Operating Personnel" commits to addressing I.C.5.

I.C.6 Verification of Correct Performance of Operating Activities

This item requires that procedures be established to ensure an effective system of verifying correct performance of operating activities is provided as a means of reducing human errors and improving the quality of normal operations.

NUREG-0737 provided clarification of this position in identifying ANSI N18.7-1972 (ANS-3.2) "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," with selected supplemental provisions as being an acceptable program for verifying operating activities. Paragraph 7, entitled "Equipment Control" commits to preparation of procedures to address I.C.6.

Staff review indicates that the applicant's latest draft of the proposed T.S. is consistent with the FSAR commitments and the positions as stated in the NUREGs. The review also reveals that Appendix 17A of the FSAR does not seek any exceptions to the positions taken in FSAR Section 13.5.1.3. Therefore, there is no longer a need to tie approval of these items to final acceptance of the T.S. or the RG 1.33 exceptions in order to make a satisfactory safety evaluation of the applicant's commitments. In this respect, the applicant's response to items I.A.1.2 and I.C.2 through I.C.6 are considered acceptable with the following exceptions: - Initial inspection of items I.C.5 (Procedures for Feedback of Operating Experience to Plant Staff) and I.C.6 (Guidance on Procedures for Verifying Correct Performance of Operating Activities) indicates that neither item has been implemented. In addition, other than the FSAR commitment, the development of programs to fulfill these commitments has yet to be started. Based on these findings and the proximity to licensing, even though the FSAR (Amendment 45) fully commits to implementation of these items, I.C.5 and I.C.6 shall be considered confirmation issues pending substantive initiative on the part of the applicant to establish effective programs in each area.