

2

George S. Thomas Vice President-Nuclear Production

## Public Service of New Hampshire

New Hampshire Yankee Division

June 20, 1986

SBN-1131 T.F. B7.1.2

United States Nuclear Regulatory Commission Washington, DC 20555

Mr. Thomas M. Novak, Acting Director Attention: Division of PWR Licensing-A

- References: (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444
  - (b) USNRC Letter, dated May 20, 1986, "Seabrook Station Technical Specification Improvement Program", T. M. Novak to R. J. Harrison
  - (c) USNRC Letter, dated June 18, 1986, "Final Draft Technical Specifications for Seabrook Power Station Unit 1", T. M. Kovak to R. J. Harrison

Seabrook Station Technical Specifications Subject:

Dear Sir:

The intent of this letter is to respond to your recent letter [Reference (c)] regarding the Seabrook Station Technical Specification Improvement Program and the certification of the Final Draft Technical Specifications.

We intend to submit to you and your staff, by June 23, 1986, those Technical Specification improvements which were identified and approved by your letter of May 20, 1986 [Reference (b)]. This submittal will incorporate those presently accepted improvements into the Seabrook FSAR, as an Appendix to Chapter 16. In regard to certification, under oath and affirmation, of those Technical Specifications transmitted to us in the Final Draft copy, we can not, at this time, conclude that all Technical Specifications are consistent with the FSAR, the SER, and the as-built facility.

During the Staff's review of our proposed Technical Specifications, and in numerous meetings, discussions and letters, we identified certain Technical Specifications which posed unwarranted limitations on the facility, or which were inconsistent with our FSAR and/or our previous licensing commitments. Attached is a listing of those items which we feel go above and beyond our licensing requirements and commitments, are inconsistent with the plant's configuration, .r will not allow utilization of the facility as it was intended. Please note that some of these items have been extensively discussed with the Staff and it is our understanding they are presently evaluating them.

8606240078 860620 PDR ADOCK 05000443 PDR A

We intend to continue to work with members of your staff to achieve satisfactory resolution of these items so that we can certify the Seabrook Station Technical Specifications by your requested date of June 23, 1986. We fully intend to provide all the necessary resources in order to work with the Staff to resolve these remaining items to support our Low Power License date of June 30, 1986.

Very truly yours,

Jury Sthes George S. Thomas

cc: Atomic Safety and Licensing Board Service List

## Page No.

- 3/4 3-41 Surveillance 4.3.3.3.2 requires channel calibration every 10 days. Our equipment requires a 30 day time frame per manufacturers recommendations.
- 3/4 3-58 Table 4.3-5 The last column should read Channel Operational Test. Both digital and analog tests are required in that column.
- 3/4 3-58 Item 2a in Table 4.3-5 has no trip or alarm function. The instrument only supplies flow data for dose calculations.
- 3/4 3-59 For the Digital Channel Operational Test, the RDMS only has an alarm/trip function. Functions b, c, and d cannot be performed by our equipment.
- 3/4 3-64 Item 2d Table 4.3-6 A Channel Operational Test cannot be performed. This is an annubar flow rate indicator and provides an input to the RDMS.
- 3/4 3-65 Item 4c Table 4.3-6 The Sampler Flow Rate Indicator is a rotometer type instrument with no external aspects. The surveillance requirements of this table cannot be performed.
- 3/4 3-66 Test requirements b, c, and d in Item 1 and 2 cannot be performed by the equipment at Seabrook Station.
- 3/4 4-21 Specification 3.4.6.2.e cannot be met by Seabrook Station as it is written. In order for us to comply with this specification and its associated surveillance (4.4.6.2.1c) we request that the Standard Tech Spec format be reinstated.
- 3/4 6-21 Surveillance 4.6.5.1 cannot be achieved as written. Our system design is for a higher flow rate than stated in the Technical Specification.
- 3/4 7-3 Specification 3.7.1.2 cannot be implemented as written. System setup 7-4 as required by the existing specification will violate other regula-7-5 tions.
- 3/4 7-16 Flow rates required by surveillance 4.7.6b are beyond the flow rate designs for the system.
- 3/4 7-17 Surveillance 4.7.6.C.l requires automatic switchover and isolation on a "T" signal, "S" signal and high radiation. Our system is designed to perform this function only on high radiation.
- 3/4 7-14 Specification 3.7.5 A footnote must be added to allow for a lower basin level when the tower is in operation.

## Page No.

- i 🖡

3/4 8-5 Surveillance 4.8.1.1.2.f.Z allows the applicant to calculate the D-G frequency for the load rejection test. Our determination for this value was 60 ± 4.0 Hz. The staff has maintained 1.2 Hz. We cannot meet this surveillance without the ±4.0 Hz.

This surveillance also requires that the load reject be 671 KW. This is the analysis value and under some plant conditions may not be possible. Under this condition we should be allowed to reject the largest load available.

- 3/4 8-6 Surveillances 4.8.1.1.2.f.4.b and 4.8.1.1.2.f.6.b requires that our diesel start, come up to speed, and load the emergency bus in 10 seconds. This is inconsistent with the requirement to start and come up to speed in 10 seconds. Our FSAR analysis shows 12 seconds to start, come to speed, and load the bus. This value should be 12 seconds.
- 3/4 9-13 Surveillance 4.9.12 cannot be achieved as written. Our system design is for a higher flow rate than stated in the Tech Spec. Also, we cannot comply with 70% relative humidity. Our review of ASTM-D3803 did not find any reference to this humidity limit.