

George S. Thomas Vice President-Nuclear Production

Public Service of New Hampshire

New Hampshire Yankee Division

NYN-89018

February 21, 1989

United States Nuclear Regulatory Commission Washington, DC 20355

Attention: Document Control Desk

References: (a) Facility Operating License NPF-56, Docket No. 50-443

(b) USNRC Generic Letter 88-14 dated August 8, 1988, "Instrument Air Supply System Problems Affecting Safety-Related Equipment"

Subject: Response to Generic Letter 88-14

Gentlemen:

Generic Letter 88-14 [Reference (b)] requires that licensees perform a design and operations verification of instrument air systems and provide a discussion of programs for maintaining proper instrument air quality. The New Hampshire Yankee response to the specific items outlined in the Generic Letter is provided as an Enclosure to this letter.

Instrument air quality at Seabrook Station is maintained in accordance with the Quality Standard for Instrument Air, ISA-S7.3. Additionally, a preventative maintenance program has been in place since initial system service and addresses component inspection and repair.

Should you have any questions regarding this response, please contact Mr. Richard Belanger at (603) 474-9574, extension 4048.

Very truly yours,

George S. Thomas

Enclosure

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cc: Mr. William T. Russell Regional Administrator United States Nuclear Regulatory Commission Region I 475 Allendale Road King of Prussia, PA 19406

Mr. Victor Nerses, Project Manager Project Directorate I-3 United States Nuclear Regulatory Commission Division of Reactor Projects Washington, DC 20555

Mr. David G. Ruscitto NRC Senior Resident Inspector P.O. Box 1149 Seabrook, NH 03874

STATE OF NEW HAMPSHIRE

Rockingham, ss.

February 21, 1989

Then personally appeared before me, the above-named George S. Thomas who, being duly sworn, did state that he is Vice President - Nuclear Production of Public Service Company of New Hampshire, that he is duly authorized to execute and file the foregoing information in the name and on the behalf of Public Service Company of New Hampshire, and that the statements therein are true to the best of his knowledge and belief.

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Beverly Erfilloway, Notary Public My Commission Expires: March 6, 1990

ENCLOSURE TO NYN-89018

Generic Letter 88-14 requires that each licensee perform a design and operations verification of instrument sir systems and that this verification be documented to the NRC Staff. The New Hampshire Yankee response to the requirements of this Generic Letter is provided herein.

Instrument air quality at Seabrook Station is controlled in accordance with the Quality Standard for Instrument Air (ISA-S7.3) by implementing the following measures:

- In-line dewpoint monitors are used to verify that the dewpoint of instrument air at the outlet of the Instrument Air System (excluding the Containment Instrument Air Subsystem) dryers is at or below -40°F.
- O In-line filters are installed which limit air system maximum entrained particle size. These in-line filters meet or exceed the requirements of the Quality Standard. Feriodic replacement of filters is part of the preventative maintenance program for instrument air systems.
- ^O Air samples are obtained at least annually and tested for oil content and contaminants to ensure compliance with air quality standards.

Additionally, a preventative maintenance program encompassing air system component inspection and repair has been in place since initial system service.

Maintenance performed on Instrument Air System equipment and safetyrelated equipment utilizing instrument air is conducted in accordance with the Seabrook Station Maintenance Program. This program requires the performance of post-maintenance testing as appropriate to ensure the proper functioning of equipment following corrective maintenance.

Two Abnormal Operating Procedures, ON1242.01, "Loss of Instrument Air," and ON1242.02, "Loss of Containment Instrument Air," address operator response to the loss of instrument air. Training is provided with regards to these procedures as part of the licensed operator training program which ensures that operators review or exercise these procedures at least annually.

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A Safety Class Equipment List (SCEL) was developed which identifies all essential active equipment required to mitigate the consequences of and safely shutdown the unit following a design basis accident. During the development of the SCEL, the function and failure mode of safety-related components utilizing instrument air was verified. The response of each safety-related air-operated component to a loss of instrument air was verified during preoperational testing to ensure that these components fail to the correct position. Additionally, a recent design review was conducted to identify those components which utilize both A and B train solenoid valves. Components identified by this review were then evaluated to ensure that the system design bases were met. This evaluation concluded that the present design of these components is adequate.

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In summary, New Hampshire Yankee has reviewed the design of instrument air systems and has determined that air quality is consistent with the component manufacturers' recommendations, that maintenance practices, procedures and training are adequate to ensure that safety-related equipment will function as intended, and that design of the instrument air system is such that air-operated safety-related components will perform as expected on loss of instrument air. In addition, NHY has recognized the significance of instrument air quality and has provided an additional level of attention in this area through the formation of an Air Systems Task Force, which is comprised of personnel from operations, maintenance, and engineering disciplines. This Task Force has been evaluating the Instrument Air System with regards to preventative maintenance, air quality, equipment reliability, and system enhancements.