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MEMORANDUM FOR: Vincent Noonan, Director PWR Project Directorate No. 5

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Ronald Ballard, Chief Engineering Branch Division of PWR-Licensing-A

Carl Berlinger, Chief Reactor Systems Branch Division of PWR Licensing-A

James Milhoan, Chief Plant Systems Branch Division of PWR Licensing-A

Faust Rosa, Chief Electrical, Instrumentation, and Control Systems Branch Division of PWR Licensing-A

Richard W. Starostecki, Director Division of Project & Resident Programs, RO: I

FROM: Charles E. Rossi, Assistant Director for PWR-A Division of PWR Licensing-A

SUBJECT: PROOF AND REVIEW OF THE SEABROOK STATION UNIT 1 TECHNICAL SPECIFICATIONS

 PLANT NAME:
 Seabrook Station Unit 1

 UTILITY:
 Public Service Company of New Hampshire

 DOCKET NO.:
 50-443

 RESPONSIBLE BRANCH:
 FOB/DPL-A

 PROJECT MANAGER:
 Victor Nerses

 REVIEW BRANCHES:
 A11/DPL-A

 REVIEW STATUS:
 Proof and Review - Technical Specifications

The attached technical specifications for Seabrook Station Unit 1 are being forwarded to you at this time for proof and review. We request that you review those sections which pertain to your particular area of responsibility and that the results of this review, identifying the sections reviewed, be forwarded to the Facility Operations Branch, PWR-A by March 28, 1986.

Contact: C. Moon x29605

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In making judgements about the correctness or adequacy of these technical specifications for Seabrook Station Unit 1 you should be guided by the principles of NRR Office Letter No. 38. Except for changes arising from the Seabrook Technical Specification improvement program discussed below, deviations from the (W) STS should not be proposed or accepted by the staff unless they are:

- necessary because of unique design features or unique organization characteristics, or
- 2) represent a significant improvement over STS which should be included in the next revision to the STS and do not represent a change in generic requirements which must be reviewed prior to implementation by CRGR.

Other deviations from the STS which have merit but are generic and require CRGR review should not be proposed at this time for Seabrook Station Unit 1. Instead they should be processed through CRGR as a revision to the STS which can later be applied to Seabrook at the licensee's request or as a backfit by the staff. Those generic changes involving an immediate safety concern should, however, not be delayed for CRGR review. Any such cases should be highlighted for expedited action by the appropriate NRC Division.

The applicant by letter of May 29, 1985, proposed a "Seabrook Station Technical Specification Improvement Program". Following discussions with the staff, the applicant included elements of that improvement program in his proposed technical specifications transmitted by letter of July 26, 1985. The first element includes changes to improve the usefulness of the Technical Specification document. A proposed NRR action on these proposed changes was transmitted to you for comment by our memorandum of February 28, 1986. Some of those changes appeared to be non-controversial and have been implemented in the enclosed Proof and Review Technical Specifications. Both those changes and changes not included in the Proof and Review will be included in the Final Draft Technical Specifications scheduled for issuance on May 16, 1986 only after consideration of your comments.

The second element includes proposed changes based on risk importance of Seabrook systems. By our memorandum of March 6, 1986 we forwarded for your comment a proposed NRR action on those changes in which the risk assessment was measured in terms of probable core melt frequency. For the remaining changes based on risk assessment, the risk assessment pertains to probability of offsite radiological consequences. The Plant Systems Branch, PWR-A will be the lead Branch in the formulation of PWR-A technical positions on these proposed changes. These technical positions should be formulated by March 28, 1986. -3-

The proposed changes are:

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3.6.2.1	Containment Building Spray-change ACTION time from 72 hours to 7 days
3.6.2.2	Spray Additive System-change ACTION time from 72 hours to 31 days
4.6.2.2a	Spray Additive System-change SURVEILLANCE interval from 31 days to 6 months
4.6.4.1	Hydrogen Monitors-change SURVEILLANCE interval from 12 hours to 7 days
4.6.4.2a	Hydrogen Recombiners-changes SURVEILLANCE interval from 6 months to
	18 months
3.6.5.2	Containment Enclosure
	Building Integrity-change ACTION time from 24 hours to 7 days
3.6.5.3	Containment Enclosure Building Structural
3.0.0.3	containment cherosore burroing scructura

Integrity-change ACTION time from 24 hours to 7 days

Gur assessment is that all of the proposed technical specification improvement changes are either based on design features and/or analyses that are unique to Seabrook, have been written to enhance public health and safety by improved usefulness of the document, or are specifically for the Seabrook organization and personnel. Your comments will be considered in a final decision on whether any changes have to be delayed by the principles of Office Letter No. 38 for processing through CRGR.

We plan to inform the Technical Specifications Coordination Branch of significant deviations from the STS in the Seabrook Technical Specifications for their assessment of whether any of the deviations represent a sufficiently significant improvement with generic applicability as to be considered in the next revision to the STS.

Mr. Calvin Moon, of FOB-PWR-A will be available during the proof and review period to answer any questions which arise. He is located in Room 522, Phillips, and his telephone extension is 29605.

Even if DPL-A Branch Chiefs have no comments and are in agreement with the technical specifications content in their areas of review, it is requested that a written response to that effect identifying those sections of the technical specifications reviewed be provided by the above specified date. That review should include all specifications in all areas of the Branch's functional responsibility, even though many of the reviewers for the SER and Supplements are not in DPL-A. All of the past reviewers are listed in Appendix F to the SER and Appendix F to SSER 3. Assigned reviewers not in DPL-A as of January 23, 1986, are listed in a memorandum of that date from Thomas M. Novak. Advise Calvin Moon if assistance from any reviewers not now in DPL-A is needed. Keep in mind that even if assistance is obtained, the "Reorganization Transition Criteria and Procedures For Reactor Licensing Activities" of November 20, 1986 require that all work be processed/concurred in and issued by the new function-ally responsible organization.

PWR Project Directorate No. 5 should forward a copy of the enclosed Technical Specifications to the applicant with a request to submit complete comments by March 28, 1986.

This transmittal was delayed beyond the scheduled date of February 28, 1986 to incorporate plant specific data that only recently became available. Some information is still unavailable. The licensing schedule calls for resolution of comments by Region I, the NRR technical branches and the applicant by May 2, 1986. Therefore, we believe that it is necessary to proceed with an incomplete document at this time. The applicant should be cautioned of the possible impact on the schedule if additional plant data is not provided by March 17, 1986.

Additional plant specific data is needed for Sections 3.5.2 (footnote), 3.8.1.1.b.4), 3.8.1.2.b.4), 4.10.4.3, 8 3/4.7.1.3, 8 3/4.7.10 and 5.3.1; for Tables 3.3-1 (ACTION 5), 4.4-4, 3.7-3 and B 3/4.4-1; and for Figures 3.2-2, 5.1-3, B 3/4.4.2, 6.2-1 and 6.2-2.

Charles E. Rossi, Assistant Director for PWR-A Division of PWR Licensing-A

Enclosure: Seabrook Station Unit 1 Technical Specifications

cc: E. Butcher

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- V. Nerses
- W. Regan
- D. Vassallo
- V. Benaroya
- B. Clayton
- C. Moon

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CMoon:bjp	BClayton	VBenaroya	CERossi
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