George S. Thomas Vice President-Nuclear Production



NYN-89046

April 28, 1989

United States Nuclear Regulatory Commission Washington, DC 20555

Attention: Document Control Desk

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

- b) PSNH Letter NYN-88007 dated January 22, 1988, "Proposed Modification to the Contro! Building HVAC (CBA) System,"
  G. S. Thomas to USNRC
- c) PSNH Letter NYN-88084 dated June 17, 1988, "Request for Additional Information: Proposed Modification to Control Building HVAC (CBA) System," G. S. Thomas to USNRC
- d) USNRC Letter dated August 24, 1988, "Control Room Habitability System," V. Nerses to R. J. Harrison

Subject: Request for License Amendment: Control Room Emergency Makeup Air and Filtration Subsystem

Fursuant to 10 CFR 50.90, New Hampshire Yankee (NHY) hereby proposes to amend the Seabrook Station Unit 1 Facility Operating License (License No. NPF-56) by incorporating the proposed changes, provided herein as Enclosure 1 in the form of marked-up Westinghouse Standard Technical Specifications, into the Seabrook Station Technical Specifications. These proposed changes result from implementation of a modification to the Control Room Habitability System as described in References (b) and (c). The NRC Staff review of these modifications is documented in Reference (d). Revised Bases for this Technical Specification are provided as Enclosure 2; however, pursuant to 10 CFR 50.36(a), these Bases are not considered part of the Technical Specifications.

The basis for these proposed changes is provided in Enclosure 3 which includes a safety evaluation. Based upon the information contained in Enclosure 3. NHY has concluded that the proposed changes do not involve an Unreviewed Safety Question pursuant to 10 CFR 50.59, nor do they involve a Significant Hazard Consideration pursuant to 10 CFR 50.92.

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New Hampshire Yankee Division of Public Service Company of New Hampshire P.O. Box 300 • Seabrook, NH 03874 • Telephone (603) 474-9521 United States Nuclear Regulatory Commission Attention: Document Control Desk April 28, 1989 Page 2

NHY has reviewed the proposed changes utilizing the criteria specified in 10 CYR 50.92 and has determined that the proposed changes would not

- 1. Involve a significant increase in the probability or consequences of an accident previously evaluated. This specification is being modified to ensure Control Room habitability during all operational modes. With the Control Room habitable as defined by 10 CFR 50 Appendix A, GDC 19 and Section 6.4 of the Standard Review Plan (SRP), proper conduct of operations will not be hindered by the Control Room environment. With Control Room habitability ensured, proper mitigation of design basis accidents may be performed as currently described in the FSAR. Proper mitigation of the accident(s) ensures that radiological releases to the environment remain within limits established by existing design basis analyses.
- 2. Create the possibility of a new or different kind of accident from any previously evaluated. Because these revised Technical Specifications ensure that Control Room habitability as defined in pertinent regulatory criteria is maintained, proper conduct of operations will not be hindered by the Control Room environment. Therefore, no type of accident could be caused directly or indirectly by this change.
- 3. Involve a significant reduction in a margin of safety. The proposed changes reflect the revised system design which ensures that Control Room operation doses would be within the GDC-19 acceptance criteria and that the system will provide protection in accordance with SRP Section 6.4, 6.5.1, and 9.4.1.

If you have any questions regarding this request, please contact Mr. Richard Belanger at (603) 474-9521, extension 4048.

Very truly yours,

George S. Thomas

Enclosures

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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

Mr. Richard H. Strome, Director Office of Emergency Management State Office Park South 107 Pleasant Street Concord, NH 03301