March 20, 1989

Docket No. 50-443

Mr. Edward Brown President & Chief Executive Officer New Hampshire Yankee Division Public Service Company of New Hampshire Post Office Box 300 Seabrook, New Hampshire 03874

Dear Mr. Brown:

SUBJECT: COMMENTS ON THE PUBLIC SERVICE OF NEW HAMPSHIRE RESPONSE TO GENERIC LETTER 88-17 FOR THE SEABROCK UNIT 1 STATION FOR EXPEDITIOUS ACTIONS FOR LOSS OF DECAY HEAT REMOVAL (TAC NO. 69776)

The NRC staff has reviewed your letter of January 3, 1989 to Generic Letter (GL) 88-17. We find that your actions are directed toward meeting the intent of the generic letter with respect to expeditious actions. There are a number of instances where the details were lacking to fully understand your actions taken in response to GL 88-17. You should consider our comments given in the enclosure in order to assure that your actions adequately addressed the intent of GL 88-17. There is no need to respond to the comments in the enclosure at this time.

As you are aware, the expeditious actions you have briefly described are an interim measure to achieve an immediate reduction in risk associated with reduced inventory operation, and these will be supplemented and in some cases replaced by programmed enhancements. We intend to audit both your response to the expeditious actions and your programmed enhancements. The areas where we do not fully understand your responses, as indicated above, may be covered in the audit of expeditious actions.

Sincerely,

Original signed by:

Victor Nerses, Project Manager Project Directorate I-3 Division of Reactor Project I/II

Enclosure As stated

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DISTRIBUTION: Docket File, NRC PDR, PDI-3 r/f, GLainas, BBoger, OGC (158-18), E. Jordan, B. Grimes, J. Peterson ARC (10), WHodges, MRushbrook, V. Nerses, RWessman

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Edward A. Brown Public Service Company of New Hampshire Seabrook Nuclear Power Station

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Mr. G. Thomas Public Service Company of New Hampshire Post Office Box 330 Seabrook, New Hampshire 03874

ENCLOSURE

Comments on New Hampshire Yankee's January 3, 1989 Submittal on Generic Letter 88-17

1. You mention discussion of the Diablo Canyon event with operations personnel of your staff. It is not specifically stated that maintenance personnel are also included. The item was intended to include all personnel who can affect reduced inventory operation.

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- 2. Your addressing of containment closure is cursory and no information is provided regarding how you will keep track of and control the many potential openings which may have to be closed simultaneously. Procedures and administrative controls should address this topic.
- 3. You mention that a procedure revision will be made to ensure containment closure in appropriate time limits in the event of loss of decay heat removal capability. However, you did not mention commitment to an explicit time for closure. Enclosure 2 to Generic Letter 88-17 provides acceptable times. If you plan to use less than a full complement of bolts for sealing the equipment hatch then you should first verify that you can make a proper seal of the periphery mating surfaces to meet the closure criteria.
- 4. You indicate that core exit temperatures will be logged every 15 minutes by an operator in the control room. Because this reading is being monitored in the control room, the need for frequent logging only arises for the case of loss of RHR. You may wish to consider a less demanding logging frequency and initiation criterion.
- 5. You indicate that Seabrook currently has two tygon tube sight glasses for RCS level indication which will be removed after programmed enhancements. Each tygon hose is connected to the bottom of a different RCS loop tap and is vented to the containment. You indicate that an observer will record level indications every fifteen minutes and that there will be communications with the control room. You also mention a Level Indicator No. 9405 which provides level indication locally and in the control room through the main plant computer. However, no details are given about the type of level indicator or where the reference legs are located. When two instruments are in place, care should be taken to resolve any discrepancy between the two measurement systems. Also, the pressure of the reference leg should approximate the pressure of the void in the hot leg or be compensated to obtain the correct level value.
- 6. Walking the tygon tube following installation to verify lack of kinks or loop seals is necessary. Experience shows that periodic walkdowns are needed after installation. We recommend daily walkdowns when the tygon tube is in use, with an additional walkdown immediately prior to its being placed in use.

- 7. You have indicated that a centrifugal charging pump will be available, whenever the RCS is in a reduced inventory condition, as the required high pressure safety injection pump. You state that you have not designated a second means of adding water to the RCS yet. This will need to be identified and procedures in place in order to enter into a reduced inventory condition.
- 8. You state that "prior to installing nozzle dams, an appropriately sized opening on the hot leg side of RCS is provided." You have not stated what this opening is. Often a pressurizer manway or steam generator manway is used as a means to provide RCS venting. We note that relatively large hot side openings in the RCS, such as a pressurizer manway, can still lead to a pressure of several psi. The large steam flow in combination of flow restrictions in the surge line and lower pressurizer hardware may lead to pressurization. Calculations should be performed to verify the effective-ness of the opening.

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