



**North  
Atlantic**

North Atlantic Energy Service Corporation  
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The Northeast Utilities System

December 19, 2001

NYN-01101

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

Seabrook Station  
"Supplemental Probabilistic Risk Assessment Information  
For License Amendment Request 01-04"

North Atlantic Energy Service Corporation (North Atlantic) was requested by the Nuclear Regulatory Commission (NRC) to provide clarifying information regarding License Amendment Request (LAR) 01-04 "Reactor Containment Integrated Leakage Rate Test (ILRT) Interval Extension" as a result of a telephone conference conducted on December 6, 2001. LAR 01-04 was forwarded to the NRC by letter (NYN-01044) dated August 2, 2001. This LAR included a copy of Engineering Evaluation EE-01-008, Revision 0, "PRA Evaluation: Risk Impact of Extending the Frequency of Containment Integrated Leak Rates Testing from 10 Years to 16 Years," which was used as part of the technical basis to support the requested ILRT interval extension. As a result of a telephone conference that was conducted on September 6, 2001, LAR 01-04 was revised, a sensitivity study was attached to the subject engineering evaluation, and forwarded to the NRC by letter (NYN-01083) dated November 2, 2001.

During the telephone conference call conducted on December 6, 2001, the NRC questioned whether the revised engineering evaluation considered both internal and external events. The Probabilistic Risk Assessment (PRA) evaluation and sensitivity study submitted in support of the ILRT extension were based on the Seabrook Station Probabilistic Safety Study (SSPSS-1999a). The base PRA and the subject engineering evaluation cover both internal and external events, including internal fires, seismic, and severe weather events. In summary, the change in Large Early Release Frequency ( $\Delta$ LERF) of  $5.0 \text{ E-}8$  as identified in the sensitivity study is below the NRC Regulatory Guide (RG) 1.174 "An Approach For Using Probabilistic Risk Assessment In Risk-Informed Decisions On Plant-Specific Changes To The Licensing Basis" acceptance guideline for very small changes. While the cumulative  $\Delta$ LERF identified in the sensitivity study is greater than the  $1.0 \text{ E-}7$  guideline for very small changes, the total LERF including external events is less than  $1.0 \text{ E-}5$ .

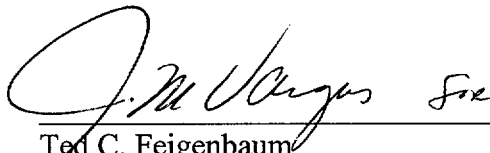
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Based on the small change in LERF and the completeness of the PRA evaluation, it is North Atlantic's position that the proposed change meets the acceptance guidelines of RG 1.174.

Should you have any questions concerning this response, please contact Mr. James M. Peschel, Manager - Regulatory Programs, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.

A handwritten signature in dark ink, appearing to read "T. C. Feigenbaum", is written over a horizontal line.

Ted C. Feigenbaum  
Executive Vice President  
and Chief Nuclear Officer

cc: H. J. Miller, NRC Region I Administrator  
G.F. Wunder, NRC Project Manager, Project Directorate I-2  
G.T. Dentel, NRC Senior Resident Inspector

STATE OF NEW HAMPSHIRE

Rockingham, ss.

DATE 12/19/01

Then personally appeared before me, the above-named Joseph Vargas, being duly sworn, did state that he is the Director of Engineering of the North Atlantic Energy Service Corporation, that he is duly authorized to execute and file the foregoing information in the name and on the behalf of North Atlantic Energy Service Corporation and that the statements therein are true and accurate to the best of his knowledge and belief.

A handwritten signature in cursive script that reads "Marilyn R. Sullivan". The signature is written in dark ink and is positioned above the printed name and title.

Marilyn R. Sullivan, Notary Public

My Commission Expires: March 19, 2002