

# New Hampshire Yankee

Ted C. Feigenbaum  
Senior Vice President and  
Chief Operating Officer

NYN-90101

April 26, 1990

United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Document Control Desk

References: (a) Facility Operating License No. NPF-86, Docket No. 50-443

(b) New Hampshire Yankee letter NYN-90097, dated April 23, 1990,  
"Application to Amend Facility Operating License No. NPF-86  
With Regard To Sale and Leaseback Transactions By The United  
Illuminating Company," T.C. Feigenbaum to USNRC.

Subject: Additional Information Related to Proposed License Amendment

Gentlemen:

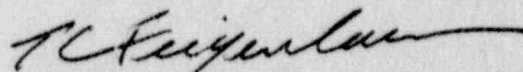
On April 23, 1990, New Hampshire Yankee (NHY) submitted a proposed amendment to the Seabrook Station Unit No. 1 Operating License regarding the sale and leaseback of a portion of The United Illuminating Company's ownership share.

As a result of recent discussions with the NRC Staff, NHY has determined that amplification of the information contained in Section VIII of the Amendment Application is appropriate. Accordingly, please find as an enclosure to this letter an explicit analysis of the proposed amendment against the three standards delineated in 10CFR50.92. This information is only meant to clarify the submittal. The terms of the transaction proposed by NHY in Reference (b) have not changed.

In addition, the citation in Section VII (page 12) of the Amendment Application should be corrected to read 10CFR51.22(c)(10).

If you have any questions on this matter, please do not hesitate to call Mr. R.J. DeLoach at (603) 474-9521, extension 2486.

Very truly yours,

  
T. C. Feigenbaum

Enclosure

9005020199 900426  
PDR ADOCK 05000443  
P PDC

New Hampshire Yankee Division of Public Service Company of New Hampshire  
P.O. Box 300 • Seabrook, NH 03874 • Telephone (603) 474-9521

13005  
11

United States Nuclear Regulatory Commission  
Attention: Document Control Desk

April 26, 1990  
Page 2

cc: Mr. Thomas T. Martin  
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. George L. Iverson, Director  
Office of Emergency Management  
State Office Park South  
107 Pleasant Street  
Concord, NH 03301

Mr. Noel Dudley  
NRC Senior Resident Inspector  
P.O. Box 1149  
Seabrook, NH 03874

United States Nuclear Regulatory Commission  
Attention: Document Control Desk

April 26, 1990  
Page 3

STATE OF NEW HAMPSHIRE

Rockingham, ss.

April 26, 1990

Then personally appeared before me, the above-named Ted C. Feigenbaum, being duly sworn, did state that he is Senior Vice President & Chief Operating Officer of the New Hampshire Yankee Division 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 New Hampshire Yankee Division of the Public Service Company and that the statements therein are true to the best of his knowledge and belief.

Beverly E. Silloway

Beverly E. Silloway, Notary Public  
My Commission Expires: February 28, 1995



New Hampshire Yankee  
April 26, 1990

ENCLOSURE TO NYN-90101

Additional Information Related to Section VIII  
(No Significant Hazards Consideration)  
of the Application to Amend  
Facility Operating License No. NPF-86

Additional Information Related to Section VIII  
(No Significant Hazards Consideration)  
of the Application to Amend  
Facility Operating License No. NPF-86

The proposed License amendment would revise Facility Operating License No. NPF-86 to authorize a sale and leaseback transaction by UI as previously described. The License amendment would be subject to the condition that neither the owner trustee nor the equity investors could exercise any control, either directly or indirectly, over (i) Seabrook Station Unit 1, (ii) power and energy produced by Seabrook Station Unit 1, or (iii) the licensees of Seabrook Station Unit 1. PSNH, through its New Hampshire Yankee Division, would continue its present responsibility as the sole licensee authorized to operate and maintain the plant and would remain exclusively responsible for all safety decisions. There would be no physical change to the plant, no change to operating procedures, and no change to the operating organization or personnel as a result of the sale and leaseback transaction described in this Application. As such, the proposed change involves no significant hazards considerations.

The following discussion provides a specific analysis of the proposed change against the three standards delineated in 10CFR50.92.

(a) The proposed amendment to the License to reflect the sale and leaseback transaction does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed amendment would not result in any physical changes to the facility, and all Operating Procedures, Limiting Conditions for Operation, Limiting Safety System Settings, and Safety Limits as specified in the Technical Specifications to Facility Operating License No. NPF-86 will remain unchanged. PSNH, through its New Hampshire Yankee Division, will continue to be responsible for the operation of

the plant and there will be no changes made in the operating organization or the personnel as a result of the proposed sale and leaseback transaction.

(b) The proposed amendment to authorize a sale and leaseback transaction will not create the possibility of a new or different kind of accident from any accident previously evaluated. The design and design bases of Seabrook Station Unit 1 remains unchanged. Accordingly, the current plant safety analyses will remain complete and accurate when addressing the licensing bases and in analyzing plant response and consequences. Additionally, the Operating Procedures, Limiting Conditions for Operation, Limiting Safety System Settings, and Safety Limits as set out in Technical Specifications for Facility Operating License NPF-86 will remain unchanged. Thus, the plant conditions for which the design bases and accident analyses were performed continue to be valid.

(c) The proposed amendment of the License to authorize a sale and leaseback transaction will not involve a significant reduction in the margin of safety. The plant safety margins for Seabrook Station Unit 1 are established through Limiting Conditions for Operation, Limiting Safety System Settings, and Safety Limits, as contained in the Technical Specifications for Facility Operating License NPF-86. The proposed License amendment will effect no change in either the physical design of the plant or any of these safety margins as specified in the Technical Specifications, and there will, accordingly, be no change to any of the margins of safety.

As a result of the above analysis, it is concluded that the proposed License amendment complies with the standards contained in 10CFR50.92(c) and, therefore, the amendment does not involve a significant hazards consideration.