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Ted C. Feigenbaum
Senior Vice President and
Chief Nuclear Officer

NYN- 93032

February 26, 1993

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

- References: (a) Facility Operating License No. NPF-86, Docket No. 50-443
- (b) North Atlantic Letter NYN-92152 dated November 3, 1992 "License Amendment Request 92-04: Proposed Revision to the Requirement for the Operations Manager to Maintain a Senior Reactor Operator License", T. C. Feigenbaum to USNRC
- (c) USNRC Letter dated February 13, 1993, "Request for Additional Information", A. W. De Agazio to T. C. Feigenbaum

Subject: Request for Additional Information (TAC No. M84896)

Gentlemen:

North Atlantic Energy Service Corporation provides in the Enclosure responses to the Requests for Additional Information forwarded by USNRC Letter, dated February 13, 1993 [Reference (c)].

Should you require additional information, please contact Mr. Terry L. Harpster, Director of Licensing Services at (603) 474-9521, extension 2765.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Ted C. Feigenbaum", is written over a large, stylized circular flourish.

Ted C. Feigenbaum

Enclosure

TCF:JMP/tad

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cc: Mr. Thomas T. Martin
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U. S. Nuclear Regulatory Commission
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Mr. Albert W. De Agazio, Sr. Project Manager
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North Atlantic
February 26, 1993

ENCLOSURE TO NYN-93032

REQUEST FOR ADDITIONAL INFORMATION
ENCLOSURE TO NYN-93032

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1. How will the requirements of 10CFR50.54(m)(2)(ii) be met at times of transition when the licensed individual in the position of Assistant Operations Manager vacates the position?

North Atlantic Response - North Atlantic presently has seven qualified Shift Superintendents, each of whom holds a senior reactor operator license, to staff a six shift rotation. The Assistant Operations Manager position is a projected career path for the Shift Superintendents, all of whom would be fully capable of assuming the position. A typical transition, which has occurred previously, is the Assistant Operations Manager assuming a new position within North Atlantic. The most likely course of action would be to promote one of the Shift Superintendents to the Assistant Operations Manager position and conduct a turnover in a controlled manner. Similar action can be presumed to be taken for a resignation by the Assistant Operations Manager. In the event of a death, disability or other such condition that would immediately cause the position to be vacant, North Atlantic management would take expedited action to fill the position as part of the normal management function. In addition, North Atlantic has additional personnel who hold senior reactor operator licenses filling the Work Control Coordinator positions and in various staff and training positions that ensure the capability to fill all positions requiring a senior reactor operator license.

2. The proposed change appears to relax the requirements for the initial appointment to the position of Operations Manager. The current Updated Final Safety Analysis Report (UFSAR) states that all station personnel must meet or exceed the requirements of ANSI/ANS 3.1-1978. ANSI/ANS 3.1-1978 states that the Operations Manager shall hold a senior reactor operator license at the time of appointment to the position. Will the requirements specified in the UFSAR for appointment to the position of Operations Manager continue to reflect an endorsement of ANSI/ANS 3.1-1978?

North Atlantic Response - No. The Seabrook Station Updated Final Safety Analysis Report (UFSAR) will be revised to take an exception to the particular requirement of ANSI/ANS 3.1-1978 for the Operations Manager to hold a senior reactor operator license at the time of appointment to the position. The revised UFSAR will require the Operations Manager to hold or to have held a senior reactor operator license for Seabrook Station. This position is consistent with ANS 3.1-1987. North Atlantic has processed the UFSAR change and will issue the change in the UFSAR upon NRC approval of the License Amendment Request. The UFSAR change would be submitted to the NRC in an annual UFSAR update after issuance of the revised Technical Specification.

North Atlantic believes that this position regarding the senior reactor operator license requirement is advantageous because it allows a license holder to assume other positions within the organization and develop additional skills and insights. A typical scenario could have an Assistant Operations Manager assume the position of Maintenance Manager, surrender his senior reactor operator license, and at some time in the future assume the Operations Manager position; bringing with him the additional skills and insights.