

# New Hampshire Yankee

Ted C. Feigenbaum  
Senior Vice President and  
Chief Operating Officer

NYN-90138

July 13, 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) USNRC Generic Letter 90-04, dated April 25, 1990, "Request for Information on the Status of Licensee Implementation of Generic Safety Issues Resolved with Imposition of Requirements or Corrective Actions"

Subject: Response to Generic Letter 90-04

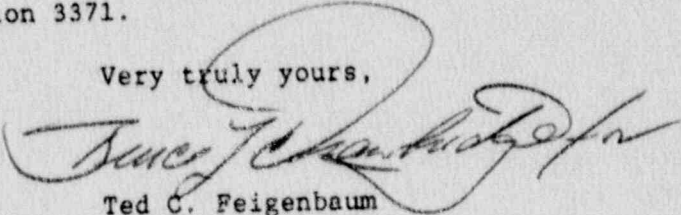
Gentlemen:

New Hampshire Yankee provides herewith the information requested by Generic Letter 90-04 regarding the status of implementation at Seabrook Station of Generic Safety Issues.

Enclosure 1 to this letter is a table, structured in the format of Enclosure 1 to Generic Letter 90-04, which has been completed as requested. The table indicates which Generic Safety Issues are not applicable to Seabrook Station. Specific implementation status information is provided for those Generic Safety Issues which are applicable to Seabrook Station.

If you have any questions on this matter, please contact Mr. Geoffrey Kingston at (603) 474-9521, extension 3371.

Very truly yours,

  
Ted C. Feigenbaum

TCF/GK:jt/dma  
Enclosure

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United States Nuclear Regulatory Commission  
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cc: Mr. Thomas T. Martin  
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United States Nuclear Regulatory Commission  
Region I  
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New Hampshire Yankee  
July 13, 1990

ENCLOSURE 1 TO NYN-90138

STATUS OF IMPLEMENTATION OF GENERIC SAFETY ISSUES  
AT SEABROOK STATION

FACILITY NAME: Seabrook Station  
 DOCKET NO: 50-443  
 LICENSEE: PSNH

July 13, 1990

STATUS OF IMPLEMENTATION OF  
 GENERIC SAFETY ISSUES AT SEABROOK STATION

<u>GSI/(NPA) NUMBER</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>REFERENCES/ COMMENTS*</u>
40 (B065)	Safety Concerns Associated With Pipe Breaks in the BWR Scram System	All BWRs	NA	
41 (B058)	BWR Scram Discharge Volume Systems	All BWRs	NA	
43 (B107)	Reliability of Air Systems	All Plants	C	NYN-89018 02/21/89
51 (L913)	Improving the Reliability of Open-Cycle Service Water Systems	All Plants	I (See Comment)	51(L913)
67.3.3 (A017)	Improved Accident Monitoring	All Plants	I (See Comment)	67.3.3 (A017)
75 (B076)	Item 1.1 - Post-Trip Review (Program Description and Procedure)	All Plants	C	SBN-576 11/04/83 SBN-1137 06/24/86
75 (B085)	Item 1.2 - Post-Trip Review - Data and Information Capability	All Plants	C	SBN-576 11/04/83 SBN-961 03/06/86
75 (B077)	Item 2.1 - Equipment Classification and Vendor Interface (Reactor Trip System Components)	All Plants	C	SBN-576 11/04/83 SBN-861 08/22/85 NYN-87061 05/04/87
75 (B086)	Item 2.2.1 - Equipment Classification for Safety-Related Components	All Plants	C	SBN-576 11/04/83 NYN-87061 05/04/87

C = Complete  
 NC = No changes necessary  
 NA = Not applicable  
 I = Incomplete  
 E = Evaluating actions required

\*For completed items, this column identifies the number and date of letter(s) containing completion information. For incomplete items, this column identifies the comment providing further information. See pages 5 - 7 for comments.



GS1/(RPA) NUMBER	TITLE	APPLICABILITY	STATUS	REFERENCES/ COMMENTS
75 (L003)	Item 2.2.2 - Vendor Interface for Safety-Related Components	All Plants	I (See Comment)	75 (L003)
75 (B078)	Items 3.1.1 & 3.1.2 - Post-Maintenance Testing (Reactor Trip System Components)	All Plants	C	SBN-576 11/04/83 SBN-1146 06/27/86
75 (B079)	Item 3.1.3 - Post-Maintenance Testing - Changes to Test Requirements (Reactor Trip System Components)	All Plants	C	SBN-576 11/04/83 SBN-861 08/22/85
75 (B087)	Items 3.2.1 & 3.2.2 - Post-Maintenance Testing (All Other Safety-Related Components)	All Plants	C	SBN-576 11/04/83 SBN-1146 06/27/86
75 (B088)	Item 3.2.3 - Post-Maintenance Testing - Changes to Test Requirements (All Other Safety-Related Components)	All Plants	C	SBN-576 11/04/83 SBN-861 08/22/85
75 (B080)	Item 4.1 - Reactor Trip System Reliability (Vendor-Related Modifications)	All Plants	C	SBN-576 11/04/83 SBN-868 09/09/85
75 (B081)	Items 4.2.1 & 4.2.2 - Reactor Trip System Reliability - Maintenance and Testing (Preventative Maintenance and Surveillance Program for Reactor Trip Breakers)	All PWRs	C	SBN-576 11/04/83 SBN-855 08/05/85
75 (B082)	Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	C	SBN-576 11/04/83 SBN-868 09/09/85 SBN-967 03/18/86
75 (B090)	Item 4.3 - Reactor Trip System Reliability - Tech Spec Change (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	C	SBN-576 11/04/83 SBN-868 09/09/85 SBN-967 03/18/86
75 (B091)	Item 4.4 - Reactor Trip System Reliability (Improvements in Maintenance and Test Procedures for B&W Plants)	All B&W Plants	NA	

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GS1/(RPA) NUMBER	TITLE	APPLICABILITY	STATUS	REFERENCES/ COMMENTS
75 (B092)	Item 4.5.1 - Reactor Trip System Reliability - Diverse Trip Features (System Functional Testing)	All Plants	C	SBN-576 11/04/83 SBN-1146 06/27/86
75 (B093)	Items 4.5.2 & 4.5.3 - Reactor Trip System Reliability - Test Alternatives and Intervals (System Functional Testing)	All Plants	C	SBN-576 11/04/83 SBN-956 03/04/86
86 (B084)	Long Range Plan for Dealing with Stress Corrosion Cracking in BWR Piping	All BWRs	NA	
93 (B098)	Steam Binding of Auxiliary Feedwater Pumps	All PWRs	C	SBN-1255 12/10/86 NYN-88074 05/23/88
99 (L017)	RCS/RHR Suction Line Valve Interlock on PWRs	All PWRs	I (See Comment)	99 (L817)
124	Auxiliary Feedwater System Reliability	ANO-1&2, Rancho Seco, Prairie Island 1&2, Crystal River 3 Ft. Calhoun	NA	
A-13 (B017)	Snubber Operability Assurance - Hydraulic Snubbers	All Plants	NC	
A-13 (B022)	Snubber Operability Assurance - Mechanical Snubbers	All Plants	NC	
A-16 (D012)	Steam Effects on BWR Core Spray Distribution	Oyster Creek & NMP 1	NA	
A-35 (B023)	Adequacy of Offsite Power Systems	All Plants	C	SBN-427 01/20/83 SBN-903 11/27/85 SBN-931 01/23/86 FSAR SECT. 8.3.1.2c

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<u>GSI/(MPA) NUMBER</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>REFERENCES/ COMMENTS*</u>	
B-10	Behavior of BWR Mark III Containments	All BWR Mark III Plants	NA		
B-36	Develop Design, Testing and Maintenance Criteria for Atmosphere Cleanup System Air Filtration and Absorption Units for Engineered Safety Features Systems and for Normal Ventilation Systems	All Plants with OL Applications After 04/01/80	NC		
B-63 (B045)	Isolation of Low Pressure Systems Connected to the Reactor Coolant System Pressure Boundary	All Plants	C	SBN-617 SBN-1167	01/30/84 07/21/86

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COMMENTS

51 (L913)

Since the commencement of Service Water System operation at Seabrook Station, NHY has addressed Service Water System reliability issues through its Service Water Task Team. In letter NYN-90037 dated February 9, 1990, New Hampshire Yankee responded to NRC Generic Letter 89-13, and provided information on completed, ongoing and incomplete actions.

The incomplete actions included conducting thermal performance baseline measurements on the Emergency Diesel Generator jacket water cooling heat exchangers and on the Primary Component Cooling Water (PCCW) heat exchangers. The initial data has been collected on the jacket water heat exchangers. Data on the PCCW heat exchangers will be obtained during the 100 percent power plateau of the Power Ascension Test Program as planned.

Supplement 1 to Generic Letter 89-13, dated April 4, 1990, presented questions and answers read into transcripts of workshops on Generic Letter 89-13. Through the answers to the questions, NRC has provided interpretations of Generic Letter 89-13 recommendations.

One interpretation is that NRC-Recommended Actions IV and V of Generic Letter 89-13 apply to closed-cycle cooling systems as well as open-cycle cooling systems that function to transfer heat from safety-related structures, systems and components to the ultimate heat sink. This interpretation, if adopted by NHY, would have the effect of including the Seabrook Station PCCW System within the scope of NRC-Recommended Actions IV and V of Generic Letter 89-13. The NHY response to Generic Letter 89-13 (NYN-90037) did not address the PCCW System within the scope of NRC-Recommended Actions IV and V. New Hampshire Yankee has considered this interpretation of Supplement 1 and decided to include the PCCW System within the scope of NRC-Recommended Actions IV and V. This decision will result in the performance of additional confirmational studies and reviews. The additional studies and reviews will be completed prior to restart following the first refueling outage. This schedule is in conformance with the schedule requested by Generic Letter 89-13.

Based upon the above, implementation of this Generic Safety Issue (GSI) is expected to be completed prior to restart following the first refueling outage.



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67.3.3 (A017)

Implementation of this GSI was addressed as part of the licensing process for Seabrook Station. New Hampshire Yankee described its conformance to USNRC Regulatory Guide 1.97, Revision 2 (and later, Revision 3), in letters dated April 14, 1983; August 30, 1985; May 30, 1986; June 6, 1986; June 26, 1986; July 18, 1986; October 15, 1986; May 19, 1989; and July 10, 1989.

In letter SBN-1143, dated June 26, 1986, NHY committed to show that the Pressurizer Relief Tank (PRT) temperature indication will remain functional and on-scale, including the maximum expected saturation temperature, during any accident that lifts the pressurizer relief valves, or provide a range that will envelop these conditions. In letter NYN-89064, dated May 19, 1989, NHY indicated that a design modification had been implemented extending the indicating range of the PRT temperature instrumentation to a temperature which is above the maximum expected saturation temperature corresponding to the PRT rupture disc pressure; and therefore the associated commitment had been completed. In Seabrook Station Safety Evaluation Report, Supplement 9 (SSER 9), dated March 1990, NRC documented its acceptance of the NHY completion of this commitment.

In letter SBN-1098 dated June 6, 1986, NHY committed to install and have operational prior to restart following the first refueling outage, the following environmentally-qualified accident monitoring instrumentation:

1. Safety Injection Accumulator Tank Level or Pressure; and
2. Containment Sump Water Temperature.

In letter NYN-89085, dated July 10, 1989, NHY committed to satisfy these commitments by upgrading safety injection (SI) accumulator pressure instrumentation and an existing containment building spray heat exchanger inlet temperature instrument to satisfy the criteria of Design Category 2 Accident Monitoring Instrumentation (AMI). In SSER 9, the above items were the only outstanding commitments associated with conformance to USNRC Regulatory Guide 1.97, Revision 3. Therefore, implementation of this GSI is incomplete pending completion of these instrumentation upgrades prior to restart following the first refueling outage.

75 (L003)

New Hampshire Yankee has committed to implement its Vendor Interface Program (Generic Letter 83-28, Item 2.2.2) in accordance with the recommendations of the Nuclear Utility Task Action Committee Report on the subject dated March 1984 (INPO Document No. 84-010). This report defines a Vendor Equipment Technical Information Program (VETIP). New Hampshire Yankee will take into account the recommendations of Generic Letter 90-03 in developing the final scope of the planned NHY VETIP. New Hampshire Yankee intends to fully implement the VETIP as it applies to Westinghouse, our NSSS vendor, and implement selected elements of the VETIP for other vendors of safety-related equipment.

The NHY response to Generic Letter 90-03, to be submitted by September 29, 1990, will contain more detailed information regarding the status and planned implementation of the VETIP. For purposes of this letter, the major items to be completed can be summarized as follows:

1. With regard to the Nuclear Plant Reliability Data System (NPRDS), the following actions are scheduled to be completed as indicated:
  - a) Submit to INPO, 100 percent of the currently-requested engineering data base prior to declaration of commercial operation of Seabrook Station Unit 1
  - b) Implement reporting of current component failures through NPRDS upon declaration of commercial operation of Seabrook Station Unit 1.
  - c) Submit to INPO, the enhanced engineering data base prior to December 31, 1990. This additional data pertains to components which have been added to the scope of NPRDS in response to a recent INPO request.
  - d) Implement reporting of current failures of the added components as soon as practicable, following submittal of the enhanced engineering data base.
2. Implement the VETIP with Westinghouse (the NSSS vendor) by December 31, 1990.
3. Implement selected elements of the VETIP with identified vendors of safety-related equipment (other than Westinghouse) by June 30, 1991.

Based on the above, implementation of this Generic Safety Issue is expected to be completed by June 30, 1991.



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99 (L817)

NRC-recommended actions to resolve this Generic Safety Issue were contained in Generic Letter 88-17. In the response to Generic Letter 88-17 (letter NYN-89012 dated February 3, 1989), NHY indicated that it was evaluating the feasibility of removing the design feature which provides automatic closure of the Residual Heat Removal (RHR) System inlet isolation valves on high pressure. New Hampshire Yankee has completed this evaluation and determined that removing this feature will reduce the probability of loss of decay heat removal without introducing other safety concerns. Therefore, NHY intends to implement this design enhancement. A request to amend the Operating License to appropriately revise Technical Specifications is scheduled to be submitted to NRC by about July 31, 1990. Contingent upon NRC approval of the operating license amendment request, the design enhancement will be installed prior to restart following the first refueling outage.

Based on the above, implementation of this Generic Safety Issue is expected to be completed prior to restart following the first refueling outage.