

North Atlantic
August 26, 1993

ENCLOSURE 2 TO NYN-93119

LICENSE AMENDMENT REQUEST 93-10

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SEABROOK STATION UNIT 1

Facility Operating License NPF-86
Docket No. 50-443

License Amendment Request No. 93-10
Change to Technical Specification 4.3.2.1

This License Amendment Request is submitted by North Atlantic Energy Service Corporation pursuant to 10CFR50.90. The following information is enclosed in support of this License Amendment Request:

- Section I - Introduction and Description of Proposed Changes
- Section II - Markup of Proposed Changes
- Section III - Retype of Proposed Changes
- Section IV - Determination of Significant Hazards for Proposed Changes
- Section V - Environmental Impact Assessment

Sworn and Subscribed
to before me this

26th day of August, 1993

Tracy A. DeCredico
Notary Public

TRACY A. DeCREDICO, Notary Public
My Commission Expires October 3, 1995

R. Jeb DeLoach
R. Jeb DeLoach
Executive Director - Engineering & Licensing

I. INTRODUCTION AND DESCRIPTION OF PROPOSED CHANGES

In Enclosure 1, North Atlantic Energy Service Corporation (North Atlantic) requested the exercise of enforcement discretion from the requirement to perform a CHANNEL CHECK on the narrow range Refueling Water Storage Tank (RWST) low-low level transmitters. In the request, North Atlantic proposed to replace the requirement for performing a CHANNEL CHECK pursuant to Technical Specification 4.3.2.1, Table 4.3-2, Functional Unit 8b, with a requirement to perform a TRIP ACTUATING DEVICE OPERATIONAL CHECK (TADOT) at least once per 92 days.

North Atlantic requested the exercise of enforcement discretion and proposed the enclosed changes to Technical Specification 4.3.2.1 because it has been determined that the existing plant design does not allow a CHANNEL CHECK to be performed that meets the intent of a CHANNEL CHECK, as defined in Technical Specification 1.6, without imposing testing requirements that are inappropriate for the existing plant conditions and which also may increase the risk of a plant transient involving a premature switchover to the containment sump. North Atlantic has requested that this License Amendment Request (LAR) be processed on an exigent basis for the reasons provided in the attached request for exercise of enforcement discretion.

In summary, New Hampshire Yankee, North Atlantic's predecessor, made an error by certifying and accepting the requirement for a CHANNEL CHECK in Technical Specification 4.3.2.1, Table 4.3-2, Functional Unit 8.b. This Technical Specification is designed for a standard plant that has wide range transmitters for the Refueling Water Storage Tank (RWST) low-low level point and that also has remote or local indication of RWST level. Seabrook Station is designed with narrow range RWST low-low level transmitters and is not equipped with either remote or local indication of RWST level.

At Seabrook Station it is not possible to perform a CHANNEL CHECK of the RWST low-low level transmitters that meets the intent of the Technical Specifications and at the same time does not impose a significant operational burden upon the Station Staff with no significant safety benefit. In fact, with the Seabrook Station design it is preferable to not perform the CHANNEL CHECK, as described in Enclosure 1, because there is a potential for damage to plant equipment, placing the plant in a condition that is not the safest possible.

On August 24, 1993, North Atlantic determined that the requirements of a CHANNEL CHECK had not been adequately performed in the past. The inadequate surveillance performance was classified as a missed surveillance and an operational check of the four RWST low-low level channels was performed on August 24, 1993 pursuant to Technical Specification 4.0.3. This non-compliance with Technical Specifications will be documented in a Licensee Event Report that will be submitted to the NRC by September 23, 1993 pursuant to 10CFR50.73.

An operability check procedure was performed on August 24, 1993 to verify the operability of the RWST low-low level instruments and to meet the intent of the CHANNEL CHECK. The procedure involves venting the level instrument and verifying that the empty alarm is actuated and that the transmitter is accurate at the zero level. The performance of this surveillance takes approximately 7 man-hours to complete and exposes personnel to increased radiation exposure (approximately 2 mrem per performance or 850 mrem total if performed until the next refueling outage) and has the potential to have personnel contaminated with radioactive water due to the draining and venting processes of the procedure. In addition, this surveillance is intrusive into the system as it requires venting while the channel is placed in a tripped condition. The surveillance unduly exercises plant equipment which over the long run may

run may cause premature end of life and may contribute to a plant transient. An evolution such as this also provides greater opportunity for operator error and is thus less safe than not performing the CHANNEL CHECK. The performance of this procedure every 12 hours to satisfy the current CHANNEL CHECK requirement imposes an unnecessary operational burden on North Atlantic without any commensurate increase in safety.

Therefore, notwithstanding the fact that an error was made in certifying the Technical Specifications in 1986, North Atlantic has requested the NRC to exercise enforcement discretion regarding the performance of the CHANNEL CHECK and to process this LAR on an exigent basis to eliminate testing that is burdensome and inappropriate for the existing plant conditions.

Description of Proposed Changes

1. Technical Specification 4.3.2.1, Table 4.3-2, Functional Unit 8b [page 3/4 3-34] is revised by deleting the requirement to perform a CHANNEL CHECK at least once per 12 hours and by adding a new requirement to perform a TADOT at least once per 92 days. A note (3) is included in the TADOT entry. The note clarifies that setpoint verification is not applicable to this TADOT. This note is added because the setpoint verification function is already performed basis by the performance of the ANALOG CHANNEL OPERATIONAL TEST (ACOT). The ACOT will continue to be performed as required by the current Technical Specifications with the approval of this amendment request. Performance of the TADOT will verify OPERABILITY of alarm function by verifying that the associated alarm points do alarm but will not verify that the alarm points alarm at a designated setpoint. Use of the notation for this application is consistent with Technical Specification 4.3.2.1, Table 4.3-1, Functional Unit 16a and 16b.
2. Technical Specification 4.3.2.1, Table 4.3-2, Table Notation, [Page 3/4/3-35] is revised by adding notation (3). Notation (3) is applicable to the proposed requirement to perform a quarterly TADOT on the narrow range RWST level transmitters, Functional Unit 8b. The notation states "Setpoint verification is not applicable".