

**North
Atlantic**

North Atlantic Energy Service Corporation
P.O. Box 300
Seabrook, NH 03874
(603) 474-9521, Fax (603) 474-2987

The Northeast Utilities System

Ted C. Feigenbaum
Senior Vice President &
Chief Nuclear Officer

NYN- 94110

September 30, 1994

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) USNRC Letter dated September 2, 1994, "Seabrook Station Emergency Preparedness (EP) Program Inspection No. 50-443/94-15," J. H. Joyner to T. C. Feigenbaum

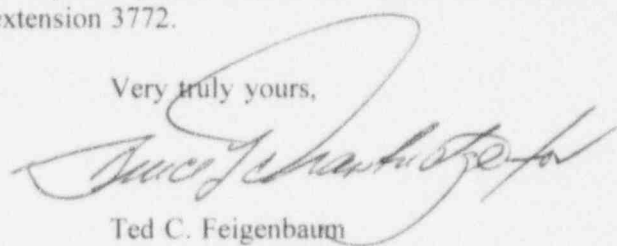
Subject: Reply to a Notice of Violation

Gentlemen:

In accordance with the requirements of the Notice of Violation contained in Reference (b), the North Atlantic Energy Service Corporation (North Atlantic) response to the cited violation is provided as Enclosure 1.

Should you have any questions concerning this response, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,



Ted C. Feigenbaum

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Enclosure

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cc: Mr. Thomas T. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Mr. Albert W. De Agazio, Sr. Project Manager
Project Directorate I-4
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Richard Laura
NRC Senior Resident Inspector
P.O. Box 1149
Seabrook, NH 03874

North Atlantic
September 30, 1994

ENCLOSURE 1 TO NYN-94110

REPLY TO A NOTICE OF VIOLATION

In a letter dated September 2, 1994 [Reference (b)], the NRC transmitted to North Atlantic Energy Service Corporation (North Atlantic) a Notice of Violation identified during the Seabrook Station Emergency Preparedness (EP) Program Inspection conducted from July 25 through July 29, 1994. In accordance with the instructions provided in the Notice of Violation, the North Atlantic response to this violation is provided below.

I. Violation

10 CFR 50 part 50.54(q) states, in part "A licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in Appendix E of this part."

Paragraph 12.4 of the Seabrook Station Radiological Emergency Plan (SSREP) states that, "The emergency equipment and supplies are maintained as indicated in Appendix F. The calibration cycle for emergency station instruments is semiannual for portable instruments and pocket dosimeters unless use requires a more frequent calibration schedule. Along with requirements for calibration, the instruments shall be source-checked during quarterly inventories and before use. There are sufficient reserve instruments and equipment to replace those that are removed from emergency kits for calibration purposes. An inventory of the emergency storage locations shall be made, and discrepancies shall be noted and corrected."

Contrary to the above, from February 19, 1993 through July 29, 1994, the station's emergency radiation detecting instruments were not source-checked during quarterly inventories and materials having limited shelf-life were not replaced, in that cabinets containing these instruments and materials were not opened for inventory. Rather, the inventory was conducted by verifying only that the seals were intact on the door hasp.

This is a Severity Level IV violation (Supplement VIII).

II. Reason for the Violation

North Atlantic does not contest this violation. North Atlantic has determined that this condition resulted from a lack of adequate procedural guidance and department policy. The existing procedures did not provide specific directions or policies on how inventories are to be performed, nor did they adequately describe the control of lead seals, or the management of shelf-life items. Additionally, no programmatic requirement existed for a formal periodic review and update of the inventory data-base. Furthermore, the facilities maintenance procedures were not always updated on a regular basis.

North Atlantic has also determined that the existing emergency preparedness procedure revision process does not systematically apprise the facilities emergency planners of approved changes to the facilities.

III. Corrective Actions

The following describes corrective actions to address the violation:

1. North Atlantic initiated a Station Information Report (SIR) to evaluate this condition and develop corrective actions.
2. North Atlantic revised the inventory control procedure to ensure compliance with NUREG-0654. Specifically, Procedure SS 91121, "Facility Inventory Control," was revised to ensure that facility emergency planning personnel open all emergency lockers/kits on a quarterly basis and perform a visual inspection for damage and/or obvious deficiencies. An inventory of the locker/kit is subsequently performed if damage or obvious deficiencies are observed or if the lead seal present on the locker/kit was not installed by the Emergency Preparedness Department. This procedure also requires the replacement of any shelf-life items that are near their expiration date.

Procedure SS 91121 has also been revised to specify those departments that are authorized to open emergency lockers/kits, to clarify and require periodic reviews of inventory sheets and to add shelf-life dates to the inventory sheets.

3. North Atlantic has revised the Seabrook Station Radiological Emergency Response Plan (SSREP) and the Seabrook Station Emergency Response Manual (SSER) to eliminate the quarterly source checks of radiation monitoring instrumentation used for emergency preparedness purposes. Radiation monitoring equipment is source checked prior to equipment use and therefore it is not necessary to perform quarterly checks. This practice is consistent with the equipment manufacturer's recommendations. Notwithstanding this, Health Physics Department personnel calibrate radiation monitoring instrumentation on an annual basis and direct reading dosimetry on a semi-annual basis.
4. North Atlantic has added emergency planners to the distribution list for approved procedure change packages. This will ensure that emergency planners are directly notified of changes affecting inventories and facility configurations.
5. North Atlantic has evaluated and is currently restructuring the Emergency Preparedness facility maintenance program. This includes redefining program specifications, including existing interfaces with the Work Control Program and the inventory data base. The revised program will be incorporated into a new document entitled the "Seabrook Station Emergency Preparedness Facility Inventory Manual." This new program is currently being reviewed and it is anticipated that it will be issued by October 28, 1994. This program will supersede existing procedures SS 91100, "Facilities Maintenance Program," and SS 91121, "Facility Inventory Control." The new program will receive periodic reviews.
6. North Atlantic has revised and updated the inventory data-base to provide greater flexibility in updating, sorting, and report generation. The revised data-base, which includes provisions for tracking shelf-life dates and repetitive task schedules, will be implemented following issuance of the aforementioned Seabrook Station Emergency Preparedness Facility Inventory Manual.

IV. Date When Full Compliance Will Be Achieved

North Atlantic is currently in full compliance with all regulatory requirements.