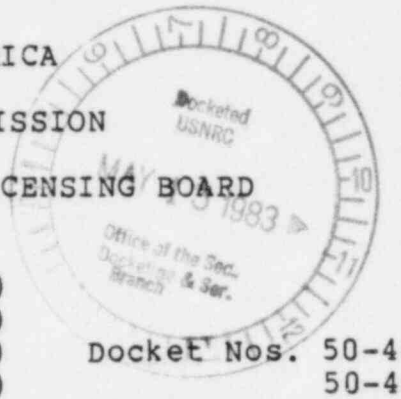
UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Mater of	)	
	)	
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, et al.	)	Docket Nos. 50-443 50-444
	)	
(Seabrook Station, Units 1 and 2)	)	
	)	

NENCP ANSWER TO NRC STAFF AFFIDAVIT REGARDING ENVIRONMENTAL QUALIFICATION OF ELECTRIC VALVE OPERATORS

On April 20, 1983, at the request of the Licensing Board, the NRC Staff filed an affidavit supporting its assertion that none of the unqualified electric valve operators inside containment at Seabrook are "important to safety", and that therefore they need not be environmentally qualified pursuant to 10 C.F.R. § 50.49. Joint Affidavit of Chu-yu Liang, William T. LeFave, and S. Stanley Kirslis, dated April 19, 1983.

NECNP has reviewed the Staff's affidavit, and disputes the Staff's conclusion for five of those electric valve operators, CS-HCV-189, CS-HCV-190 (item 13 of the Staff's affidavit), RC-V81 (item 14), and SA-SV-4A and SA-SV-4B (item 12):

(1). Electric valve operators CS-HCV-189/190 and RCV-81 may be relied on for feed and bleed during an accident. Their failure to operate could prevent the successful cooling of the reactor. Therefore, they are "important to safety" components under the rule.

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(2). Valve operators SA-SV-4A/4B are associated with the containment service air system. Failure of the containment service air system could result in abnormally high or low pressure on safety related valves, which could bend the valves or mislead the operators as to their exact position. Under those circumstances, the safety releated air operated valves could not be relied upon to perform their safety function. Because the failure of the containment service air system could lead to the inability of safety related valves to perform their function, the Staff has not satisfied its burden of proving that electric valve operators SA-SV-4A/4B are not "important to safety" components.

With regard to the five electric valve operators listed above, the Staff has not met its burden of proving that there is no material issue of fact and that NRC and the Applicants are entitled to summary judgment as a matter of law. Therefore, summary disposition should be denied.

Respectfully submitted,

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STATEMENT OF MATERIAL FACTS REGARDING ELECTRIC VALVE OPERATORS CS-HCV-189, CS-HCV-190, AND RC-V81, AS TO WHICH THERE IS A GENUINE ISSUE TO BE HEARD

1. Unqualified valve operators CS-HCV-189, CS-HCV-190, and RC-V81 (items 13 and 14 of the Staff affidavit) are located in series on the same letdown line. Safety grade containment isolation valve CS-V149 is also located on this line. See FSAR Figure 9.3-13.

2. The NRC Staff states that the systems associated with electric valve operators CS-HCV-189, CS-HCV-190, and RC-V81 are not relied upon during post-accident operations. NRC Staff Affidavit at 5. Those electric valve operators, however, coud be relied upon if feed and bleed were used as a means of cooling the reactor during an accident. Under those circumstances, the containment isolation valve, CS-V149 could not be relied upon because it is capable only of stopping, not controlling, coolant flow. Instead, electric valve operators CS-HCV-189, CS-HCV-190, and RC-V81 would be called upon to control the "bleeding" of hot reactor coolant from the letdown line.

3. The Westinghouse Owners Group Emergency Response Guidelines are being used as the basis for the development of the Seabrook Station Emergency Operating Procedures. Letter from J. Devincentis, Yankee Atomic Electric Co., to D.G. Eisenhut, NRC, dated April 14, 1983. Enclosure at 3. Those emergency response guidelines rely on the feed and bleed

mechanism for reactor cooling following safety injection. They also rely on balancing of charging and letdown flows to equilibriate primary and secondary steam generator pressures during steam generator tube rupture accidents.

4. Since feed and bleed may be relied on at Seabrook for cooling the reactor following certain accident conditions, the failure of electric valve operators CS-HCV-189, CS-HCV-190, and RC-V81 could prevent desired modes of cooling and thereby impact the functioning of safety related equipment. Therefore these electric valve operators must be considered important to safety under the definition of 10 C.F.R. § 50.49(b)(2), and must be environmentally qualified pursuant to 10 C.F.R. § 50.49(a).