



North  
Atlantic

SEABROOK STATION UNIT 1

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

License Amendment Request No. 94-03  
Modification of the Technical Specification Administrative  
Control Requirements for the Emergency and Security Plans (TAC No. M90116)

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 - Significant Hazards Consideration Evaluation
- Section V - Environmental Impact Assessment

Sworn and Subscribed  
to before me this

7<sup>th</sup> day of October, 1994

Beverly E. Sillaway  
Notary Public

Bruce L. Drawbridge  
Executive Director - Nuclear Production

## **I. Introduction and Description of Proposed Changes**

### **A. Introduction**

The NRC issued Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans," on December 28, 1993. Generic Letter 93-07 provides guidance for a licensee to utilize in proposing changes to the Technical Specifications to remove the audit of the emergency and security plans from the list of responsibilities of the company nuclear audit and review group, the Nuclear Safety Audit Review Committee (NSARC) at Seabrook Station. The NRC determined that Parts 50 and 73 of Title 10 of the Code of Federal Regulations (10CFR) included provisions that are sufficient to address these audit requirements.

Generic Letter 93-07 also provides guidance to allow Technical Specification changes to remove (1) the review of the emergency and security plans from the list of responsibilities of the unit review group, the Station Operation Review Committee (SORC) at Seabrook Station, and (2) the requirements for the SORC to review procedures, and procedure changes, for the implementation of the emergency and security plans, provided the licensee relocates these requirements to the respective emergency and security plans.

License Amendment Request (LAR) 94-03 proposes changes to the Seabrook Station Technical Specifications that are consistent with the guidance provided in Generic Letter 93-07. In addition, North Atlantic will revise the Seabrook Station Radiological Emergency Plan and the Seabrook Station Security Plan to provide explicit requirements for the SORC to review the plans, procedures, and procedure changes, for the implementation of these plans. North Atlantic has scheduled these plan changes to be issued by November 30, 1994 to support the issuance of the requested license amendment.

### **B. Determination of Costs Associated with LAR 94-03**

The following information is submitted as requested in Generic Letter 94-03 to help the NRC in evaluating the cost of complying with the suggestion to propose Technical Specification changes,

#### **1. Licensee Staff Time and Costs to Prepare the Amendment Request**

Approximately 210 staff hours were required to prepare LAR 94-03. This includes the time to prepare the request, obtain technical reviews and reviews by the SORC, NSARC and Executive management.

#### **2. Estimate of Long-Term Savings**

North Atlantic does not foresee any significant long-term savings related to the removal of the audit responsibilities from the NSARC. The deletion of duplicate requirements does not have a direct relationship to the utilization of North Atlantic resources. North Atlantic will continue to perform audits of the Seabrook Station Radiological Emergency Plan, the Seabrook Station Security Plan, and their implementing procedures and does not foresee a reduction in the audit organization related to this change. At this time, the NSARC is still reviewing completed audits of these plans.

### C. Description of Proposed Changes

The proposed changes are described below for each section of the Technical Specifications revised by LAR 94-03.

1. Technical Specification 6.4.1.6, (Page 6-7)

The responsibilities for the SORC are revised by deleting paragraphs i. and j. These paragraphs are noted as "not used" to avoid renumbering the Technical Specifications and to avoid unnecessary changes to procedures and other documents that reference the Technical Specifications. This change is consistent with the model technical specifications provided in Enclosure 2 of Generic Letter 93-07.

2. Technical Specification 6.4.2.8, (Page 6-10)

The listing of required NSARC Audits is revised by deleting paragraphs k. and l. These paragraphs are noted as "not used" to avoid renumbering the Technical Specifications and to avoid unnecessary changes to procedures and other documents that reference the Technical Specifications. This change is consistent with the model technical specifications provided in Enclosure 2 of Generic Letter 93-07.

3. Technical Specification 6.7.1, (Page 6-12)

The listing of required written procedures is revised by deleting paragraphs c. and d. These paragraphs are noted as "not used" to avoid renumbering the Technical Specifications and to avoid unnecessary changes to procedures and other documents that reference the Technical Specifications. This change is consistent with the model technical specifications provided in Enclosure 2 of Generic Letter 93-07.

### D. Requested Schedule for Review and Approval

North Atlantic requests NRC review and approval of License Amendment Request 94-03 and issuance of a license amendment by March 25, 1995.

## **II. Markup of Proposed Changes**

See attached markup of proposed changes to the Technical Specifications.