

BACKUS, MEYER & SOLOMON

ATTORNEYS AT LAW

116 LOWELL STREET

P.O. Box 516

MANCHESTER, N.H. 03105

(603) 668-7272

ROBERT A. BACKUS
JON MEYER*
STEVEN A. SOLOMON
MICHAEL E. PAVES
B. J. BRANCH
JENNIFER ROOD**

TELECOPIER
(603) 668-0730

ALSO ADMITTED:
*TO MASSACHUSETTS BAR
**TO MAINE BAR

July 10, 1991

United States Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

Attention: Marvin W. Hodges, Director
Division of Reactor Safety

Re: Docket No. 50-443
Public Service Company of New Hampshire
Inspection Report No. 50-443/91-80

Dear Mr. Hodges:

I yesterday received Inspection Report No. 91-80 from your office, which I have read with great interest. I am the attorney representing the Seacoast Anti-Pollution League, a long-time intervenor in Seabrook licensing matters.

The very comprehensive report prepared by your staff on Seabrook maintenance issues raised a number of disturbing questions, and is very illuminating.

On page 21, the report talks about the establishing of incentive goals for the Seabrook maintenance department, and offers as examples of those "incentive goals": completing the first refueling outage in 67 days; performing all maintenance and operations work, including the refueling outage, within the approved 1991 budget. A third goal was to maintain the work request backlog at, or below the production goal.

It struck me that these goals, or at least the first two, were directed toward budgetary considerations, and not toward a nuclear safety standard, or a standard of excellence in regard to plant operations from a public health and safety perspective.

Does your office have an opinion on the appropriateness of these goals for the maintenance department, and whether or not there should be other goals. I would appreciate getting your perspective on this issue.

Very truly yours,


Robert A. Backus

RAB:jsr

cc: SAPL 9108270063 910816
PDR ADOCK 05000443
Q PDR