

December 19, 1983

SBN- 601  
T.F. B7.1.2

United States Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. George W. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket  
Nos. 50-443 and 50-444  
(b) PSNH Letter, dated March 12, 1982, "Response to 410 Series  
RAIs", J. DeVincentis to F. Miraglia  
(c) PSNH Letter, dated February 2, 1983, "Revised Response to  
RAI 440.133", J. DeVincentis to G. W. Knighton  
(d) PSNH Letter, dated February 17, 1983, "Open Item  
Responses", J. DeVincentis to G. W. Knighton

Subject: Decay Heat Removal

Dear Sir:

The systems relied on in the Seabrook design to maintain hot standby conditions for four (4) hours with subsequent cooldown to hot shutdown for transfer to Residual Heat Removal (RHR) has been discussed in References (b), (c), and (d).

- o Response to RAI 410.40 [Ref. (b)] verified the availability of local manual control of the Steam Generator Atmospheric Relief Valves on loss of off-site power and after the SSE.
- o Response to RAI 420.38 [Ref. (d)] provided a discussion on how Seabrook satisfies the ICSB Guidance Concerning Remote Shutdown Station Designs.
- o Response to RAI 440.133 [Ref. (c)] provided a discussion on how Seabrook satisfies the guidance of BTP RSB 5-1 (Design Requirements of the Residual Heat Removal System).

Boo!  
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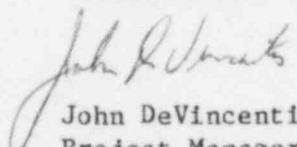
In References (c) and (d), among other things, we committed to provide safety-grade controls and actuators for the Steam Generator Atmospheric Relief Valves (ARVs). This commitment was made to satisfy the guidelines of BTP RSB-5-1 which requires the use of only safety-grade equipment to achieve cold shutdown. Our original design called for pneumatic actuators with non-IE controls. Since making this commitment, we have proceeded in good faith with the engineering activity required to provide this capability and have recently finalized pricing and schedule of this work. We now find that the material costs alone for the new ARV actuators are in excess of \$600,000, and the lengthy delivery schedule and extensive field work to install the new actuators will severely impact our construction effort.

There is no existing regulatory requirement to have the capability to achieve the cold shutdown condition with only safety-related equipment. We feel strongly that there is little benefit to be gained by upgrading the ARV actuators. The existing ARV pneumatic actuators will be operable after the SSE. The air supply is not safety-grade, but the air compressors are powered from the emergency buses. Local manual control is provided to permit operation of the ARVs, should the Air System be lost. It is expected that the Air System could be restored during the four (4) hours that hot standby can be maintained with the main steam safety valves. Local pressure gauges and communications to the Control Room and Remote Shutdown locations will be available to aid local control.

Based on the absence of regulations, excessive monetary costs, impact on Construction, availability of local manual control, and the time available for maintenance action to restore the Air System (should it be lost), we intend to retain the existing ARV pneumatic actuators and controls. The FSAR and the applicable RAI responses will be revised to reflect this change.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

  
John DeVincentis  
Project Managers

cc: Atomic Safety and Licensing Board Service List