

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONDOCKETED
USNRC

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Before the
ATOMIC SAFETY AND LICENSING BOARDOFFICE OF SECRETARY
OF LICENSING & SERVICE
BRANCH

In the Matter of:

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
ET AL.Docket Nos.: 50-443
and
50-444

(Seabrook Station, Units 1 and 2)

April 10, 1984

THE STATE OF NEW HAMPSHIRE'S SUPPLEMENTAL
RESPONSE TO APPLICANT'S INTERROGATORIES
FILED ON DECEMBER 8, 1982INTRODUCTION

The State of New Hampshire provides below its supplemental response to certain interrogatories propounded by the Applicant on December 8, 1982, on Contention NH-10 -- Control Room Design.

Interrogatory II-2

Please specify in detail each respect in which NHAG contends that the Seabrook Control Room Design does not comply with GDC-19.

Interrogatory II-3

Please specify in detail each respect in which NHAG contends that the Seabrook Control Room Design does not comply with GDC-20.

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Interrogatory II-4

Please specify in detail each respect in which NHAG contends that the Seabrook Control Room Design does not comply with GDC-21.

Interrogatory II-5

Please specify in detail each respect in which NHAG contends that the Seabrook Control Room Design does not comply with GDC-22.

Responses to II-2 through II-5:

See responses to II-6, II-7, and II-8 below.

Interrogatory II-6

Please specify in detail each respect in which NHAG contends that the Seabrook Control Room Design does not comply with NUREG-0737, Item I.D.1.

Response to II-6:

The Detailed Control Room Design Review (DCRDR) required by NUREG 0737 (Item I.D.1) and Supplement 1 thereto has not been completed. While the Applicant has submitted a DCRDR and one revision to the NRC, the document on its face is not complete. See "Seabrook Station Control Room Design Review," submitted under cover of Public Service Company of New Hampshire August 10, 1983, letter to NRC, at pp. 20-21. Furthermore, the NRC Staff in its January 4, 1984, report entitled "Results of In-Progress Audit of Seabrook Station Detailed Control Room Design Review" indicates that the DCRDR is not complete. In fact, the Staff notes that "further submissions will be necessary to fully satisfy the requirements of Supplement 1 to NUREG-0737". See Audit at p. 17.

The list of particular items not included in the Seabrook DCRDR is outlined on pages 18 and 19 of the January 4, 1984, NRC Staff audit, and on page 21 of the Applicants' August 10, 1983, submittal to the NRC. The State of New Hampshire contends that the failure to include each of these items in the DCRDR constitutes a lack of compliance with NUREG-0737 (Item 1.D.1) and Supplement 1 thereto. Of particular concern is the Applicant's failure to include in its DCRDR a review of the safety parameter display system, the radiation monitoring system, and the remote shutdown panel.

Furthermore, the State of New Hampshire shares the NRC staff view that the Applicant has not complied with the systems function and task analysis requirement of NUREG-0737 and Supplement 1 thereto, and the concomitant failure to compare the results of this analysis with a control room inventory.

Finally, the State of New Hampshire contends that the improvements to the Control Room Design indicated from the DCRDR have not been properly coordinated with changes resulting from other improvement programs in Control Room Design. The State of New Hampshire agrees with the Staff's statement that the Applicant has not described in detail how the coordination is being accomplished. New Hampshire does not agree, however, with the Staff's conclusion that the Applicant is "satisfying" the coordination requirement of Supplement 1 to NUREG-0737. See Audit at p. 16. For example, given the complete absence of documentation of the Applicant's compliance

with the SPDS requirement (see response to II-7, below), New Hampshire cannot conclude that the SPDS requirement has been properly coordinated with the DCRDR.

Interrogatory II-7

Please specify in detail each respect in which NHAG contends that Seabrook Control Room Design does not comply with NUREG-0737, Item I.D.2.

Response to II-7:

In its November 3, 1982, answers to the State of New Hampshire's First Set of Interrogatories, the Applicant indicated that the "details of the SPDS layout will be developed in our response to the requirements that the NRC's developing for emergency response facilities". New Hampshire has seen no further reference or documentation on the Applicant's compliance with the SPDS requirement. In the complete absence of any documentation of compliance, New Hampshire contends that the Applicant has not complied with any of the requirements of NUREG-0737 (Item I.D.2) and §4 of Supplement 1 thereto. Furthermore, the Applicant has not prepared a written safety analysis describing the basis on which the selected parameters are sufficient to assess the safety status of each identified function as required by section 4.2 of Supplement 1 NUREG-0737.

Interrogatory II-8

Please specify each change in the Seabrook Control Room Design that, if made, would satisfy NHAG that the Seabrook Control Room Design complies with all applicable regulatory requirements.

Response to II-8:

New Hampshire's first concern is that the control room design undergo a complete review. New Hampshire has indicated above certain aspects of the Detailed Control Room Design Review which have not yet been completed. When the various improvements to the control room design have been coordinated with changes resulting from other improvement programs such as SPDS, based on a comprehensive function and task analysis of the control room design, New Hampshire will then be able to judge whether the final control room design comports with all the regulatory requirements.

Interrogatory II-9

For each change specified in response to the foregoing interrogatory, please: (i) identify each and every United States Nuclear Power Plant that incorporates the change specified, and (ii) identify each and every United States Nuclear Power Plant that does not incorporate the change specified.

Response to II-9:

No change from original answer.

I, the undersigned, being first duly sworn, do depose and say that the foregoing answers are true except insofar as they are based on information that is available to the State of New Hampshire and the New Hampshire Attorney General, but not within my personal knowlege as to which I, based on such information, believe them to be true.

Stephen S.T. Fan

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THE STATE OF NEW HAMPSHIRE
STRAFFORD, SS.

Personally appeared this 4 day of April 1984, Dr. Stephen S.T. Fan, before me, the undersigned officer, and made oath that the foregoing statements are true to the best of his knowledge and belief.

Carol C. French

Notary Public/Justice of the Peace

CARDL FRENCH, Notary Public
My Commission Expires June 6, 1985

CERTIFICATE OF SERVICE

COLLECTED
JAN 12 1984

I, George Dana Bisbee, Esquire, do hereby certify that a copy of the foregoing Supplemental Responses to Applicant's Interrogatories Filed on December 8, 1982, and Motion to Withdraw Contention NH-21, has been mailed this 10th day of April, 1984, by first class mail, postage prepaid, to:

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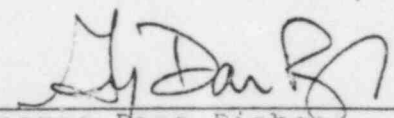
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Dated:

April 10, 1984



George Dana Bisbee