



Public Service of New Hampshire

New Hampshire Yankee Division

April 8, 1985

SBN-789

United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Mr. Richard W. Starostecki, Director  
Division of Project and Resident Programs

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket  
Nos. 50-443 and 50-444  
(b) NRC Letter, dated March 8, 1985, Samuel J. Collins to  
Robert J. Harrison, Combined Inspection Nos. 50-443/84-20,  
50-444/84-08  
(c) PSNH Letter SBN-783, dated March 29, 1985, "Emergency  
Operating Procedures Generation Package", J. DeVincentis to  
G. W. Knighton

Subject: Unresolved Item 443/84-17-02

Dear Sir:

Unresolved Item 443/84-17-02 concerned discrepancies between safety injection (SI) system description and FSAR/procedural requirements for operator action during SI recirculation. This unresolved item has led to a broader concern over the interfaces among the licensee, the architect engineer, and the NSSS supplier. The following response addresses both the specifics of the unresolved item and the more general concern with the interface.

Westinghouse conducted an investigation to determine why there were discrepancies in Section 6.3 of the FSAR. They have determined that the cause of the discrepancies was human error. The portion of FSAR Table 6.3-7 that addresses switchover from cold leg recirculation to hot leg recirculation was added at our request after reviewing the original Westinghouse-prepared table. The Westinghouse group that revised the table requested that it be reviewed by their System Design Group. Westinghouse records show that the reviewer confirmed the table was acceptable. However, FSAR Section 6.3.2.5c and Figure 6.3-2 (Sheet 3 of 19) conflict with Step 2 of the table. It is not clear whether the reviewer actually reviewed the text of the FSAR before approving the table.

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The discrepancies in the Seabrook FSAR were caused by human error while making changes to a previously prepared table. Westinghouse has two equally acceptable procedures for switchover from cold leg to hot leg recirculation. One was followed when the text was originally prepared and the other when the table was revised. The error was in not reviewing the text to assure consistency when the table was revised.

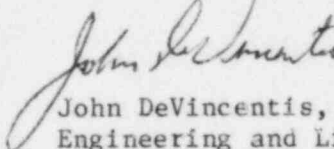
We are continuing to evaluate the two alternatives for valve line-up when in hot leg recirculation to determine if one is preferred. Upon completion of this evaluation, we will revise the FSAR to make Section 6.3.2.5c, Figure 6.3-2 (Sheet 3 of 19) and Table 6.3-7, agree, and will assure that other documentation is consistent.

We have independently reviewed the Westinghouse procedures for FSAR input generation and revision and have concluded they are adequate to assure the technical accuracy of the FSAR as it reflects the requirements of Westinghouse design documents and as it describes and presents the results of safety evaluations. These procedures are governed by the Westinghouse Quality Assurance Program which has been accepted by the NRC as satisfying the requirements of 10CFR50, Appendix B.

In mid-February, prior to this unresolved item, a task team with members from New Hampshire Yankee, Yankee Atomic Electric Company, Westinghouse, and the Independent Review Team was established to review the existing NSSS interface between Westinghouse and United Engineers and Constructors. The main functions of this task team were to assess the existing interface by performing mini-audits in selected areas, reviewing the existing procedures, and providing the appropriate recommendations for management disposition. The results from the audits are presently being reviewed by Westinghouse and United Engineers and Constructors to verify the adequacy of the NSSS interface. Upon completion of this review, appropriate recommendations will be provided for management disposition.

In conclusion, we have determined that this particular item was an isolated error of inconsistency with no safety significance; Westinghouse procedures are adequate to assure technical accuracy of the FSAR; and a program exists to review the interface between Westinghouse and United Engineers and Constructors.

Very truly yours,



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