

New Hampshire Yankee

NYN- 92080

June 19, 1992

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

Attention: Document Control Desk

- References:
- (a) Facility Operating License No. NPF-86, Docket No. 50-443
 - (b) NHY Letter NYN 92032 dated March 20, 1992 "License Amendment Request 91-10; Decoupling of the Loss of Offsite Power/Safety Injection Test From the 24 Hour Diesel Generator Surveillance Run
 - (c) NHY Letter NYN 92054 dated April 24, 1992 "Confirmation of NHY Commitments Regarding Emergency Diesel Generator Testing

Subject: Supplement 1 to License Amendment Request 91-10; "Revisions to the Diesel Generator Surveillance Requirements

Gentlemen:

New Hampshire Yankee (NHY) submitted License Amendment Request 91-10, Decoupling of the Loss of Offsite Power/Safety Injection Test From the 24 Hour Diesel Generator Surveillance Run, to the NRC on March 20, 1992 [Reference (b)]. The NRC, in a teleconference, on April 15, 1992 stated that the testing performed on the emergency diesel generators did not fully meet the intent of Regulatory Position C.2.a.(5) of Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electrical Power Systems". NHY concurred with the NRC position. NHY, in a letter to the NRC dated April 24, 1992 [Reference (c)], confirmed how diesel generator testing was to be conducted the next time the plant entered MODE 5 and committed to supplement License Amendment Request 91-10 to clarify the existing Seabrook Station Technical Specification.

Representatives of NHY and the NRC met on May 5 and June 10, 1992 to discuss NHY's proposal for acceptable alternatives to the present Surveillance Requirements. The proposed alternatives, presented in Supplement 1 to License Amendment Request 91-10 will alleviate the burden imposed by the current requirements by removing unnecessary outage schedule constraints. The current Technical Specification requires that a Loss of Offsite Power/Safety Injection (LOP/SI) test be performed within 5 minutes of the diesel generator 24 hour run of Surveillance Requirement 4.8.1.1.2f.7). This LOP/SI surveillance can only be performed near the end of the outage when all of the required engineered safety features (ESF) equipment is returned to service. By requiring an LOP/SI test near the end of the outage, the outage is extended for a minimum of 48 hours, for testing of both diesel generators. Eliminating this extension alleviates the scheduling difficulties and the associated financial burden due to the need to purchase replacement power for the additional period. The proposed revision to the diesel generator Surveillance Requirements will meet the intent of Regulatory Guide 1.108.

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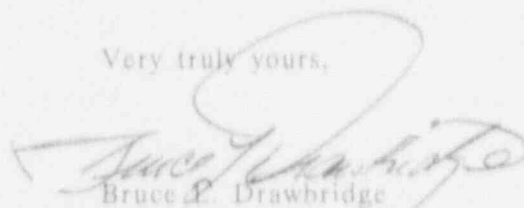
To facilitate the NRC review of Supplement 1 to License Amendment Request 91-10, NHY has enclosed a stand-alone document which is to be used in its entirety in place of the original License Amendment Request 91-10.

Supplement 1 to License Amendment Request 91-10 has been reviewed and approved by the NHY Station Operation Review Committee and the Nuclear Safety Audit Review Committee.

As discussed in the enclosed License Amendment Request 91-10, Section V, the proposed changes have been determined not to involve a significant hazards consideration pursuant to the standards of 10CFR50.92. A copy of this letter and the enclosed License Amendment Request 91-10 have been forwarded to the State of New Hampshire State Liaison Officer pursuant to 10CFR50.91(b).

New Hampshire Yankee requests NRC review of Supplement 1 to License Amendment Request 91-10 and issuance of a license amendment by August 15, 1992. This schedule is proposed to alleviate unnecessary schedule constraints during the upcoming refueling outage, scheduled to begin on September 7, 1992. Should you have any questions regarding this letter, please contact Mr. Terry L. Harpster, Director of Licensing Services, at (603) 474-9521 extension 2765.

Very truly yours,



Bruce E. Drawbridge
Executive Director Nuclear Production

TCF:MDO/ss

Enclosure

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