



SEABROOK STATION  
Engineering Office

Public Service of New Hampshire

May 1, 1985

New Hampshire Yankee Division

SBN- 797

T.F. E5.1.2

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) Letter, dated June 22, 1984, "Request for Approval to Implement ASME B&PVC Case N-368", J. DeVincentis to G. W. Knighton
  - (c) USNRC Letter, dated July 30, 1984, "Use of ASME Code for the Seabrook Station Units 1 and 2", G. W. Knighton to R. J. Harrison
  - (d) USNRC Letter, dated October 6, 1984, "Use of ASME Code Case N-368 for the Seabrook Station Units 1 and 2", G. W. Knighton to R. J. Harrison

Subject: Use of ASME Code Case N-368

Dear Sir:

In your letter, dated July 30, 1984 [Reference (c)], it was stated that the NRC conditionally approved our request [Reference (b)] for authorization to use ASME Code Case N-368 for application in the pressure testing of piping associated with the discharge side of ASME Code Class 2 and 3 centrifugal pumps. Subsequent to the staff's approval for its use at the Seabrook Station, the staff informed us that a Westinghouse 10CFR21 Report, regarding a possible overpressure condition in the Component Cooling Water Systems designed by Westinghouse, could have an impact on our use of the code case.

In your letter, dated October 6, 1984 [Reference (d)], we were requested to evaluate the relevance of the Westinghouse 10CFR21 Report to those fluid systems which utilize Code Case N-368. The incident described in the Westinghouse report involved the isolation of the Component Cooling Water System head tank vent valve due to a signal from radiation detectors. The Seabrook Primary Component Cooling Water System (PCCW) head tanks have an open vent line which cannot be isolated, thus precluding a similar occurrence.

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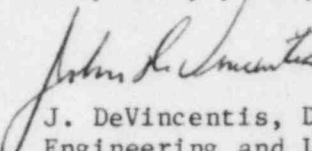
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Additionally, we have no intention of applying this code case to PCCW pump testing, and the only application for which this code case has been currently utilized was the testing of the Safety Injection (SI) pumps. The SI pumps can experience a pressurized suction only during the recirculation mode. The discharge piping of the SI pumps is designed to accommodate this pressurized suction condition plus the discharge head of the pump.

Therefore, the Seabrook SI pumps which utilize this code case will not experience the potential overpressure condition reported in the Westinghouse 10CFR21 Report. In the event where in the future we elect to utilize this code case again, we will assure that the particular piping system design would accommodate any additional head should a similar scenario to the Westinghouse CCW design situation exist.

Should you or your staff have any questions regarding this response, please feel free to contact us.

Very truly yours,



J. DeVincentis, Director  
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