

The Seacoast Anti-Pollution League

Founded 1969

SAPL

~~127 HIGH STREET / P. O. BOX 1136~~

PORTSMOUTH, NH 03802

603-431-5089

July 1, 1996

Richard W. Cooper, II, Director
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

Re: On-line Maintenance at Seabrook Station

Dear Mr. Cooper:

It is our understanding, based upon a schedule of planned NRC inspections appended to the latest SALP Report for Seabrook, that the licensee intends to recommence the practice of on-line maintenance in September or not long thereafter. It is further our understanding, based upon Seabrook Station Integrated Performance Assessment Process Inspection Report No. 50-443/96-80 at page 22, that the on-line maintenance program was first begun in April 1995 and that "the intent of this program was to perform maintenance work on reactor components normally performed only during outages."

We further understand, based upon the above-cited inspection report and NRC Inspection Report No. 95-13, that during an on-line calibration of a steam flow line on October 19, 1995, reactor operators were unaware of the actual thermal power level at which the reactor was operating and therefore increased thermal power above the licensed limit. This same potentially devastating error recurred later in October 1995 and went undetected for a period of approximately 19 hours after the Main Plant Computer System defaulted the calorimetric to the steam flow mode following installation of some software.

We further understand that, in August of 1995, the licensee was allowed to perform maintenance on an Emergency Core Cooling System (ECCS) valve that, according to the licensee's operability determination, left one train of ECCS inoperable during the performance of the maintenance.

Please provide us with answers to the following questions:

- 1) How does a maintenance program which allows the licensee to render safety systems inoperable during operations square

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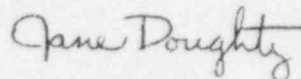
SAPL Letter to R. Cooper, NRC, 7/1/96 --- p. 2

with the Nuclear Regulatory Commission's much-touted "defense in depth philosophy"?

2) The Seabrook Nuclear Power Plant was licensed pursuant to regulations that mandated that there be redundant safety systems in place to assure that the public health and safety would be protected. What is the NRC's legal justification for allowing plant safety systems, that are mandatory requirements for plant licensure, to be deliberately defeated during plant operation?

Your prompt reply to the above questions will be appreciated. We certainly expect that in all fairness we should receive the answers at least four weeks prior to any anticipated commencement of on-line maintenance at Seabrook.

Sincerely,



Jane Doughty

Via Certified Mail

cc: Commissioner Jackson
EPZ Municipalities
Citizens Within the Ten Mile Radius
We The People
New England Coalition on Nuclear Pollution
Various media outlets

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