

New Hampshire Yankee

Ted C. Feigenbaum
President and
Chief Executive Officer

NYN- 92084

June 24, 1992

United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Attention: Mr. Thomas T. Martin

- References:
- (a) Facility Operating License No. NPF-86, Docket No. 50-443
 - (b) USNRC Letter dated May 21, 1992, "Initial Systematic Assessment of Licensee Performance (SALP) Report for Seabrook for the period from November 1, 1990 to February 29, 1992 (50-443/90-99)," T. T. Martin to T. C. Feigenbaum
 - (c) SALP Meeting between USNRC and NHY, June 8, 1992 at Seabrook Station

Subject: Initial Systematic Assessment of Licensee Performance (SALP) Report No. 50-443/90-99

Dear Mr. Martin:

New Hampshire Yankee (NHY) has reviewed the initial SALP Report [Reference (b)] and the comments provided by NRC Region I personnel during the June 8, 1992 SALP meeting [Reference (c)]. New Hampshire Yankee generally agrees with your conclusions. The following comments are provided to clarify specific sections of the SALP Report and provide suggested revisions that would more accurately reflect activities discussed in the report.

The SALP Report states on page 2, paragraph 3 that:

"Performance of control room operators was excellent; however, errors outside the control room lead to mispositioning of valves and contamination of the demineralized water system. These auxiliary operator errors and the recently identified deficiencies in log keeping practices of auxiliary operators are of significant concern to the NRC."

During the SALP meeting NRC personnel clarified that the phrase "outside the control room" referred to activities performed outside of the horseshoe area of the control room. The work control desk is included in the area referred to in the initial SALP report as "outside the control room". The paragraph referenced above implies that the auxiliary operators were responsible for the contamination of the demineralized water system, while

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the actual responsibility for this event lies with the approval of the tagging order restoration by the Work Control Coordinator. The auxiliary operators implemented the tagging order restoration but were not responsible for the error in that tagging order restoration which resulted in the improper valve position. With consideration of the above, NHY believes that the referenced paragraph should be revised so that it is clear that the Work Control Coordinator, not the auxiliary operators was responsible for the demineralized water system contamination. Such a revision would be consistent with previous NHY submittals to the NRC and other regulatory organizations. This same comment is applicable to page 4, paragraph 3.

In addition, the SALP report states in part on page 7, paragraph 4 that "... with long term DAW located in the on-site Unit 2 cooling tower building". The cooling tower building at Seabrook Station is common to both units. Although the DAW is stored in the Unit 2 side of the cooling tower building, it is appropriate to refer to this building simply as the "on site cooling tower building."

The above comments are provided solely for clarification of the report and do not change any of the conclusions in the report.

Although we are pleased with the accomplishments of plant operations to date, we recognize the challenges ahead in performing our second refueling outage and the need for a careful, conservative approach to normal plant operations. Our goal is to address the issues raised in the SALP report and continue to steadily improve our performance. We appreciate the NRC staff's useful input in helping us achieve this goal.

Should you desire additional information regarding NHY's response to the SALP report, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,



Ted C. Feigenbaum

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