



**North  
Atlantic**  
Energy Service Corporation

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Telephone (603) 474-9521

NYN- 92172

December 31, 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) USNRC Letter dated December 1, 1992, "NRC Region 1 Inspection 50-443/92-25," J. C. Linville to T. C. Feigenbaum
  - (c) North Atlantic Letter dated December 10, 1992, "Licensee Event Report (LER) 92-022-00: Non-compliance With Technical Specification Surveillance Interval for Containment Air Locks", T. C. Feigenbaum to USNRC
  - (d) North Atlantic Letter dated December 11, 1992, "Licensee Event Report (LER) 92-023-00: Missed Technical Specification Surveillances", T. C. Feigenbaum to USNRC

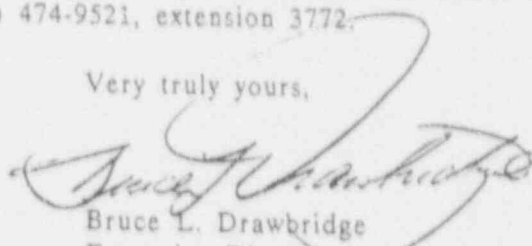
Subject: Reply to a Notice of Violation

Gentlemen:

In accordance with the requirements of the Notice of Violation contained in Reference (b), the North Atlantic Energy Service Corporation (North Atlantic) response to the Notice of Violation is provided as Enclosure 1.

Should you have any questions concerning this response, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,



Bruce L. Drawbridge  
Executive Director  
Nuclear Production

BLD:TGP/tad

Enclosure

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G PDR

a member of the Northeast Utilities system

STATE OF NEW HAMPSHIRE

Rockingham, ss.

December 31, 1992

Then personally appeared before me, the above-named Bruce L. Drawbridge, Executive Director of Nuclear Production, being duly sworn, did state that he is of the North Atlantic Energy Service Corporation that he is duly authorized to execute and file the foregoing information in the name and on the behalf of North Atlantic Energy Service Corporation and that the statements therein are true to the best of his knowledge and belief.

*Tracy A. DeCredico*

Tracy A. DeCredico, Notary Public  
My Commission Expires: October 3, 1995

cc: Ted C. Feigenbaum  
Senior Vice President and  
Chief Nuclear Officer  
North Atlantic Energy Service Corporation  
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Mr. Thomas T. Martin  
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NRC Senior Resident Inspector  
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North Atlantic  
December 31, 1992

ENCLOSURE TO NYN-92172

### Reply to a Notice of Violation

During an NRC inspection conducted at Seabrook Station on October 13 - November 16, 1992, two violations of NRC requirements were identified. The violations as provided in Enclosure 1 to Inspection Report 50-443/92-25 are listed below:

- A. Technical Specification 4.6.1.3.a requires that containment air lock seal leakage be verified at least once per 72 hours, when the plant is in mode 4 and the air lock is being used for multiple entries.

Contrary to the above, on November 10, 1992 the containment air lock seal leakage had not been verified for over 72 hours after the plant had entered mode 4 and the air lock had been used for multiple entries.

This is a Severity Level IV violation.

- B. Technical Specification 4.0.5.a states that inservice testing of ASME Code Class 1,2, and 3 valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

1. Contrary to the above, on November 12, inservice valve stroke testing of check valves, IA-V-8031, 8032, 8033, and 8034, which supply instrument air to the component cooling water system temperature control valves, had not been performed in accordance with Section XI of the AMSE Boiler and Pressure Vessel Code.
2. Contrary to the above, on November 16, inservice valve stroke testing of the 'A' accumulator isolation valve, SI-V-3, had not been performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

This is a Severity Level IV violation.

### Violation A

#### Reason for the Violation

This event was discussed in Reference (c), Licensee Event Report (LER) No. 92-22-00. North Atlantic has determined that the root cause of the violation is as follows:

The cause for this event was determined to be the lack of an administrative mechanism to alert operations staff to perform the air lock seal surveillance at the completion of long term outages when containment integrity has been set. Operations procedure ON1090.04, "Containment Entry," provides an adequate administrative mechanism to ensure that this surveillance is performed during all phases of power operation and for initial entry following reactor shutdown. This procedure does not apply, however, when multiple containment entries are being made during outages. The routine surveillance airlock seal test surveillance package, 1-MM-OT001, procedure OX1460.01, "Airlock Seal Test Containment,"

is normally generated on a weekly basis during power operation, or when specifically required for a containment entry. While this frequency is adequate for power operation where containment entries are typically made every two weeks, it is not adequate for periods of multiple containment entries at the completion of an outage.

#### Corrective Actions

North Atlantic personnel identified this violation during the review of surveillance packages. Upon discovery, the following actions were taken:

1. Upon determination that Technical Specification 4.6.1.3 surveillance interval had been exceeded, a leak test was immediately performed on the personnel hatch. This test demonstrated that containment integrity was not compromised.
2. Operations Management reviewed this event, the root cause, and the corrective actions with the operating crews.
3. North Atlantic initiated a Human Performance Enhancement System (HPES) evaluation for this event. The recommendation from the HPES evaluation are incorporated in the corrective actions and the corrective actions to prevent recurrence.

#### Corrective Actions to Prevent Recurrence

North Atlantic's corrective actions to prevent recurrence include the following:

1. The airlock seal test surveillance package, 1-MM-OT001, will be automatically computer generated every 48 hours when the plant is in MODES 2, 3, and 4. This will ensure that the air lock seal surveillance is performed at least every 72 hours whenever containment entries are made while in these modes. It is anticipated that this action will be completed by January 15, 1993.
2. A status board has been installed in the work control area in the Control Room to remind operators of the containment hatch status and the containment air lock surveillance status.
3. A Training Development Request (TDR) will be initiated to ensure that this event is reviewed with Operations shift crews during pre-outage training sessions. It is anticipated that this TDR will be issued by January 15, 1993.
4. The personnel air lock is equipped with a system that will automatically determine the air lock leak rate after each air lock usage. This system is not currently in service. North Atlantic will evaluate the return of this system to service.

#### Date of Full Compliance

The immediate corrective actions taken by North Atlantic resulted in compliance with Technical Specification 4.6.1.3.a. These actions were completed on November 10, 1992. Additionally, the longterm corrective actions described above will ensure continued compliance with this Technical Specification.

## Violation B

### Reason for the Violation

These events are discussed in Reference (d), Licensee Event Report (LER) No. 92-23-00. North Atlantic has determined that the root cause of the violation is as follows:

1. The root cause of not testing the Inservice Test of the Instrument Air check valves during the second refueling outage has been identified as personnel error.

Inservice Testing, which verifies valve position indication, status lights and stroke times of various Primary Component Cooling Water (PCCW) valves, is performed in accordance with procedure OX1412.11, "PCCW System Cold Shutdown Valve Test". Included in this procedure is the open and close exercise of the Instrument Air backup air supply isolation check valves, IA-V-8030, IA-V-8031, IA-V-8032, and IA-V-8033. These check valves are in the piping between Instrument Air Loop A and Loop B and the backup nitrogen supply cylinders which provide safety grade nitrogen to the PCCW Temperature Control Valves and PCCW Temperature Control Bypass Valves.

The initial surveillance testing performed during the second refueling outage per procedure OX1412.11 was unsatisfactory when two PCCW valves exceeded their required stroke time limits. The instrument air check valves were not tested at this time since the effect of repairs on the remainder of the testing was unknown. The valves which initially failed were repaired and successfully tested. However, the instrument air check valves were not included in the retest surveillance. The original surveillance was not annotated to indicate that it was a partial surveillance. If it had been so annotated the retest coordinator or Work Control Supervisor would have been alerted to the fact that the surveillance was to be performed for more than just a retest of the failed valves.

In addition, it was determined that these Instrument Air check valves had not been tested quarterly as required by the North Atlantic Inservice Testing Program as submitted to the NRC on March 11, 1991. Plant modifications were installed during the first refueling outage to allow performance of the testing. These valves were inappropriately listed in procedure OX1412.11 and were therefore tested on a cold shutdown basis instead of quarterly. As a result, from the first refueling outage until the second refueling outage, these check valves were only tested once, that being during the first refueling outage.

2. The root cause of missing the Inservice Test of the SI accumulator isolation valve has been identified as a procedure deficiency. The test of the SI accumulator isolation valves should have been coded as being required for Cold Shutdown. However, it was erroneously coded as an event driven surveillance. Had it been properly coded, existing programs would have identified this surveillance on the MODE 5 to MODE 4 checklist.

### Corrective Action

North Atlantic personnel identified the events listed in Violation B during the review of surveillance packages. Upon discovery, the following actions were taken:

1. The Inservice Testing of Instrument Air check valves IA-V-8030, IA-V-8031, IA-V-8032, IA-V-8033 and SI accumulator isolation valve SI-V-3 was performed on the same day it was identified that the tests had been missed (November 12 and 16, 1992, respectively). All valves were tested satisfactorily.

### Corrective Actions to Prevent Recurrence

North Atlantic's longterm corrective actions will include the following:

1. Testing of the Instrument Air check valves will be included in the Station Procedures for performing quarterly valve operability tests. This is expected to be completed by January 30, 1993.
2. The Inservice Testing of the SI accumulator isolation valves will be coded as a cold shutdown surveillance. This is expected to be completed by March 31, 1993.
3. The concept of proper documentation of partially completed surveillances (RTS's) will be stressed to operators and retest personnel during the first phase of 1993 requalification training. This is expected to be completed by March 1, 1993.
4. "Partial RTS" stamps will be provided to make it easier to identify partial surveillances. This is expected to be completed by January 30, 1993.
5. The method for writing/changing RTS's when procedures are written, revised or changed will be reviewed and appropriate changes made. This is expected to be completed by June 30, 1993.
6. North Atlantic will investigate adding a screen to the Action Statement Tracking program to provide a list of surveillances required when an action statement is entered. This is expected to be completed by June 30, 1993.
7. The method of developing, revising and changing procedures which implement the Inservice Testing program will be reviewed and appropriate changes made. This is expected to be completed by June 30, 1993.

### Date of Full Compliance

The immediate corrective actions taken by North Atlantic resulted in compliance with Technical Specification 4.0.5.a. In addition, the longterm corrective actions described above will ensure that the probability of recurrence of this type of event will be minimized.