



**North
Atlantic**

North Atlantic Energy Service Corporation
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The Northeast Utilities System
February 18, 2000

Docket No. 50-443

AR# 00001997

NYN-00006

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Seabrook Station
License Amendment Request 00-02,
“Revision to Technical Specifications and Associated Bases to Support the
Second Ten-Year Interval Inservice Test Program”

North Atlantic Energy Service Corporation (North Atlantic) has enclosed herein License Amendment Request (LAR) 00-02. LAR 00-02 is submitted pursuant to the requirements of 10CFR50.90 and 10CFR50.4.

LAR 00-02 proposes changes to Seabrook Station Technical Specification Surveillance Requirements (SR) 4.0.5.a, 4.0.5.b, 4.0.5.e and 4.4.6.2.2.e and Bases Sections 4.0.5 and 3/4.4.2. North Atlantic is submitting the proposed changes primarily to comply with the requirements of 10CFR50.55a(f)(4)(ii). North Atlantic requests NRC Staff review of LAR 00-02 and issuance of a license amendment by August 4, 2000 (see Section V enclosed) to support the implementation of the Second Ten-Year Interval Inservice Test (IST) Program by August 18, 2000.

LAR 00-02 has been reviewed and approved by the Station Operation Review Committee and the Nuclear Safety Audit Review Committee.

As discussed in LAR Section IV of Enclosure 1, the proposed change does not involve a significant hazard consideration pursuant to 10CFR50.92. A copy of this letter and the enclosed LAR has been forwarded to the New Hampshire State Liaison Officer pursuant to 10CFR50.91(b).

North Atlantic has determined that LAR 00-02 meets the criteria of 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement (see Section VI of Enclosure 1).


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In addition to LAR 00-02, North Atlantic has included in Enclosure 2, a request to utilize the ASME OM Code-1995 (including OMa Code-1996) as an alternative to the 1989 Edition (no Addenda) of Section XI for the IST for pumps and valves pursuant to the requirements of 10 CFR 50.55a(f)(4)(iv).

Should you have any questions regarding this letter, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.


Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer

cc: H. J. Miller, NRC Regional Administrator
R.M. Pulsifer, NRC Project Manager, Project Directorate 1-2
R. K. Lorson, NRC Senior Resident Inspector

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ENCLOSURE 1 TO NYN-00006



**North
Atlantic**

SEABROOK STATION UNIT 1

**Facility Operating License NPF-86
Docket No. 50-443**

**License Amendment Request No. 00-02,
"Revision to Technical Specifications and Associated Bases to Support the
Second Ten-Year Interval Inservice Test Program"**

This License Amendment Request is submitted by North Atlantic Energy Service Corporation pursuant to 10CFR50.90. The following information is enclosed in support of this License Amendment Request:

- **Section I - Introduction and Safety Assessment for Proposed Change**
- **Section II - Markups of Proposed Changes**
- **Section III - Retype of Proposed Change**
- **Section IV - Determination of Significant Hazards for Proposed Change**
- **Section V - Proposed Schedule for License Amendment Issuance and Effectiveness**
- **Section VI - Environmental Impact Assessment**

I, Ted C. Feigenbaum, Executive Vice President and Chief Nuclear Officer of North Atlantic Energy Service Corporation hereby affirm that the information and statements contained within this License Amendment Request are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

**Sworn and Subscribed
before me this**

18 day of **February**, 2000

Marilyn P. Sullivan
Notary Public

Ted C. Feigenbaum
Ted C. Feigenbaum
Executive Vice President and Chief Nuclear Officer

Section I

Introduction and Safety Assessment for the Proposed Change

I. INTRODUCTION AND SAFETY ASSESSMENT OF THE PROPOSED CHANGE

A. Introduction

License Amendment Request (LAR) 00-02 proposes changes to Technical Specification Surveillance Requirements (SR) 4.0.5.a, 4.0.5.b, 4.0.5.e, and 4.4.6.2.2.e. Additionally, LAR 00-02 proposes changes to Technical Specification Bases sections 4.0.5 and 3/4.4.2. These changes are necessary in order to implement the 2nd Ten-Year Interval Inservice Test (IST) program in accordance with the requirements of the 1995 Edition of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code-1995) including the 1996 Addenda (OMa Code-1996). Changes are also proposed to Bases section 3/4.4.2 to clarify that the pressurizer Code Safety valves will be only tested when removed from the reactor coolant system. Additional changes are proposed to SR 4.0.5.b to clarify the surveillance interval requirements for components tested on a Semi-quarterly and Biennial frequency.

B. Proposed Specifications To Be Revised

Surveillance Requirement 4.0.5.a
Surveillance Requirement 4.0.5.b
Surveillance Requirement 4.0.5.e
Surveillance Requirement 4.4.6.2.2.e Operational Leakage
Bases Specification 4.0.5
Bases 3/4.4.2 Safety Valves

C. Safety Assessment

BACKGROUND

As identified in the Seabrook Updated Final Safety Analysis Report (UFSAR) section 3.9(B).6, the present IST program for Seabrook Station was based upon the requirements given in the ASME Boiler and Pressure Vessel Code, Section XI, 1983 Edition, through the Summer 1983 Addenda except where specific relief had been granted by the Commission. This program constituted the initial (first) 120-month IST program interval. Nuclear Regulatory Commission (NRC) regulations (10 CFR 50.55a(f)(4)(ii)) require that inservice testing conducted during successive 120-month intervals comply with the requirements of the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed in paragraph (b). Additionally, the regulations (10 CFR 50.55a(f)(5)(i)) require that the IST program be revised by the licensee, as necessary, to meet the requirements of paragraph (f)(4) of this section.

In order to comply with the above identified regulations, North Atlantic proposes to update the IST program to the requirements of ASME OM Code-1995 and OMa Code-1996. The update of the IST program will conflict with certain provisions identified in SR 4.0.5.a, 4.0.5.b, 4.0.5.e, and 4.4.6.2.2.e and Bases sections 4.0.5 and 3/4.4.2. NRC regulations (10 CFR 50.55a(f)(5)(ii)) specify that if a revised IST program for a facility conflicts with the technical specification for the facility, the licensee shall apply to the Commission for amendment of the technical specifications to conform the technical specification to the revised program. As such, this license amendment request (LAR) is being submitted in order to comply with the requirements of 10 CFR 50.55a(f)(5)(ii).

Additional changes are proposed to SR 4.0.5.b to clarify the surveillance interval requirements for components tested on a Semi-quarterly and Biennial frequency.

DESCRIPTION OF THE TECHNICAL SPECIFICATION CHANGE REQUEST

Changes to Surveillance Requirement 4.0.5.a:

Technical Specification Surveillance Requirement (SR) 4.0.5.a is identified as follows:

Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

The proposed change replaces section 4.0.5.a with the following:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i).

Inservice testing of ASME Code Class 1, 2, and 3 components shall be performed in accordance with the Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(f), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(f)(6)(i).

The proposed change is necessary to clearly identify that the IST of pumps and valves is performed in accordance with the requirements of Section 50.55a(f) and that the referenced Code is the ASME OM Code instead of Section XI of the ASME Boiler and Pressure Vessel Code for IST. A rule change (57 FR 34666) dated August 6, 1992 separated the requirements for IST of pumps and valves from those for Inservice Inspection (ISI) by placing the requirements for IST in a separate paragraph (50.55a(f)). A rule change (64 FR 51370) dated September 22, 1999 changed the latest referenced Code for IST in regulations (50.55a(b)(3) from the 1989 Edition of Section XI of the ASME Boiler and Pressure Vessel Code to the 1995 Edition of the OM Code (including the 1996 addenda).

Changes to Surveillance Requirement 4.0.5.b:

Technical Specification Surveillance Requirement (SR) 4.0.5.b is identified as follows:

- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and

Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for Performing inservice inspection and testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

The proposed change replaces section 4.0.5.b with the following:

- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda shall be applicable as follows in these Technical Specifications:

<u>ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for performing inservice inspection and testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Semi-quarterly	At least once per 46 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

The proposed changes to 4.0.5.b will add the words "the ASME OM Code including" to the second and fourth lines between the words "and applicable." The words "the ASME OM Code including" will be added to the second line between the words "and applicable" of the title "ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing." The term "Semi-quarterly" at a frequency of "At least once per 46 days" will be added to the above table between the terms monthly and quarterly. The term "Biennially or every 2 years" at a frequency of "At least once per 731 days" will be added to the above table after the term "Yearly or annually."

The addition of the words "the ASME OM Code including" as designated is included to clearly identify that the IST of pumps and valves is performed in accordance with the ASME OM Code instead of Section XI of the ASME Boiler and Pressure Vessel Code.

The addition of the term "Semi-quarterly" at a frequency of "At least once per 46 days" and the term "Biennially or every 2 years" at a frequency of "At least once per 731 days" are included to allow the 25% extension of Specification 4.0.2 to be applied. A literal interpretation of SR 4.0.5.c identifies that the provisions of Specification 4.0.2 are applicable only to the terms and frequencies specifically identified in the table outlined in 4.0.5.b. Subsections ISTB and ISTC of ASME OM Code-1995 (including OMa Code-1996) have provisions for the Biennial (or 2 year) frequency for comprehensive pump testing and valve position verification testing. Subsection ISTB of the Code has provisions for doubling the quarterly test frequency for pumps determined to be in the alert range. The utilization of the provisions of Specification 4.0.2 for the "Semi-quarterly" and the "Biennially or every 2 years" frequency is consistent with the provisions of SR 3.0.2 as identified in NUREG-1431 "Standard Technical Specifications Westinghouse Plants" which apply to all individual specifications unless otherwise excluded.

Changes to Surveillance Requirement 4.0.5.e:

Technical Specification Surveillance Requirement (SR) 4.0.5.e is identified as follows:

- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

The proposed change replaces section 4.0.5.e with the following:

- e. Nothing in the ASME Boiler and Pressure Vessel Code or the ASME OM Code shall be construed to supersede the requirements of any Technical Specification.

The proposed change to SR 4.0.5.e will add the words "or the ASME OM Code" after the words "ASME Boiler and Pressure Vessel Code." The addition of the subject words is to clearly identify that the requirements of the ASME OM Code used for the IST of pumps and valves are also superseded by the requirements of any Technical Specification.

Changes to Surveillance Requirement 4.4.6.2.2.e:

Technical Specification Surveillance Requirement (SR) 4.4.6.2.2.e is identified as follows:

- e. As outlined in the ASME Code, Section XI, paragraph IWV-3427 (b).

The proposed change to SR 4.4.6.2.2.e will delete the existing sentence and replace it as follows:

- e. Testing pursuant to Specification 4.0.5.

The provision to test in accordance with the ASME Code, Section XI, paragraph IWV-3427(b) will not apply to testing performed in accordance with the ASME OM Code-1995 (including OMa Code-1996). Paragraph IWV-3427 (b) applies to the corrective action testing of Category A (Seat Leakage Tested) valves 6 inches nominal pipe size and larger. As previously identified, Seabrook Station will be utilizing the ASME OM Code-1995 (including OMa Code-1996) for inservice testing of valves for the 2nd Ten-

Year Test Interval. The corrective action and analysis of valve leakage rate results is specifically identified Paragraph ISTC 4.3 of the ASME OM Code-1995 (including OMa Code-1996).

Changes to Bases Section 4.0.5:

Bases section 4.0.5 is identified as follows:

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of OPERABLE does not allow a grace period before a component, that is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

The proposed change replaces Bases section 4.0.5 with the following:

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence

over the ASME OM Code provision which allows pumps that can only be tested during plant operation to be tested within 1 week following plant startup.

- Added the words "the ASME OM Code including applicable" to the first sentence in the first paragraph after the words "ASME Boiler and Pressure Vessel Code and."
- Additionally, added the words "the ASME OM Code including" to the first sentence in the second and third paragraphs after the words "ASME Boiler and Pressure Vessel Code and."

The addition of the wording as described is included to clearly identify that the IST of pumps and valves will be performed in accordance with the ASME OM Code instead of Section XI of the ASME Boiler and Pressure Vessel Code.

- Revised the second sentence in the third paragraph as follows:

The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME OM Code provision which allows pumps that can only be tested during plant operation to be tested within 1 week following plant startup.

Reference to the ASME Boiler and Pressure Vessel Code was removed. The provisions of subsection IWP-3400 of Section XI of the ASME Boiler and Pressure Vessel Code that allows pumps to be tested within 1 week after a plant is returned to normal operation is not applicable for testing when utilizing the ASME OM Code. Reference to the OM Code was added because the provisions of subsection ISTB "Inservice Testing of Pumps in Light-Water Reactor Plants" (paragraph ISTB 5.4) also conflict with the requirements of Specification 4.0.4. The proposed statement was limited to pumps because there are no similar provisions for valves in subsection ISTC "Inservice Testing of Valves in Light-Water Reactor Power Plants."

- Revised the second sentence in the third paragraph as follows:

The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME OM Code provision which allows pumps that can only be tested during plant operation to be tested within 1 week following plant startup.

Reference to the ASME Boiler and Pressure Vessel Code was removed. The provisions of subsection IWP-3400 of Section XI of the ASME Boiler and Pressure Vessel Code that allows pumps to be tested within 1 week after a plant is returned to normal operation is not applicable for testing when utilizing the ASME OM Code. Reference to the OM Code was added because the provisions of subsection ISTB "Inservice Testing of Pumps in Light-Water Reactor Plants" (paragraph ISTB 5.4) also conflict with the requirements of Specification 4.0.4. The proposed statement was limited to pumps because there are no similar provisions for valves in subsection ISTC "Inservice Testing of Valves in Light-Water Reactor Power Plants."

Changes to Bases Section 3/4.4.2:

The third paragraph of Bases section 3/4.4.2 is identified as follows:

Demonstration of the safety valves' lift settings will occur only during shutdown and will be performed in accordance with the provisions of Section XI of the ASME Boiler and Pressure Vessel Code.

The proposed change replaces Bases section 3/4.2.2 with the following:

Demonstration of the safety valves' lift settings will be performed when removed from the reactor coolant system in accordance with the provisions of the ASME Code for Operation and Maintenance of Nuclear Power Plants.

The third paragraph of Bases section 3/4.4.2 refers to the setpoint testing of the pressurizer Code safety valves. The purpose of revising the subject sentence is to clearly identify that the valves will be tested when they are removed from the reactor coolant system as opposed to during shutdowns only. One of the purposes of this statement was to prevent the "in-place" testing of the pressurizer Code safety valves while the plant was at power. The pressurizer Code safety valves are tested off-site by a valve vendor at a valve test facility and may be tested during periods when the plant is not shutdown. Section I 1.35(c) of Appendix I, "Inservice Testing of Pressure Relief Devices in Light-Water Reactor Power Plants" of the ASME OM Code, has a provision that allows Class 1 valves when replaced with a full complement of valves to be tested within 12 months of removal from the system. The resumption of electric power generation may occur prior to the expiration of the 12-month period identified above. This sentence as revised will not permit testing of the subject valves in-place in the reactor coolant system when the plant is at power but will accommodate testing performed at a vendor's test facility.

Bases section 3/4.4.2 was also revised to clearly identify that lift setpoint testing of the pressurizer safety valves will be performed in accordance with the ASME OM Code instead of Section XI of the ASME Boiler and Pressure Vessel Code.

SAFETY ASSESSMENT:

The proposed changes to Technical Specification Surveillance Requirement 4.0.5.a, 4.0.5.b, 4.0.5.e, and 4.4.6.2.2.e. and Bases sections 4.0.5 and 3/4.4.2 are administrative in nature and do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, configuration of the facility.

The changes to the Technical Specifications are being proposed to separate requirements for inservice testing from those applicable to inservice inspection, to clarify that the IST program will be performed in accordance the requirements of SR 4.0.5 and the ASME OM Code instead of Section XI of the ASME Boiler and Pressure Vessel Code, to clarify that the pressurizer Code Safety valves will only be tested when removed from the reactor coolant system and to clarify the surveillance interval requirements for components tested on a Semi-quarterly and Biennial frequency.

The purposes of inservice testing programs are to assess the operational readiness of pumps and valves, to detect degradation that might affect component operability, and to maintain safety margins with provisions for increased surveillance and corrective action. 10 CFR 50.55a defines the requirements for applying industry codes and standards to each licensed nuclear powered facility. Licensees are required by existing NRC regulations (10 CFR 50.55a(f)(4)(i)) to initially prepare programs to perform inservice testing of certain ASME Section III, Code Class 1, 2, and 3 pumps and valves during the initial 120-

month interval. The regulations require that programs be developed utilizing the latest edition and addenda incorporated in paragraph (b) of 10 CFR 50.55a on the date 12 months prior to the date of issuance of the operating license subject to the limitations and modification identified in paragraph (b). The initial IST program was developed in accordance with the regulations to comply with the 1983 Edition of the ASME Boiler and Pressure Vessel Code, including Addenda through the Summer of 1983.

NRC regulations also require that the IST programs be revised during successive 120-month intervals to comply with the latest edition and addenda of the Code incorporated by reference in paragraph (b) 12 months prior to the start of the interval. It is intended that the 2nd Ten-Year (120-month) interval will begin on August 18, 2000. On August 18, 1999, the latest edition and addenda of the ASME Code referenced in paragraph (b) was the 1989 Edition (no Addenda) of Section XI. Since the ASME OM Code-1995 (including OMa Code-1996) was not incorporated in paragraph (b) until November 22, 1999, North Atlantic has enclosed a request (Enclosure 2) to utilize the ASME OM Code-1995 (including OMa Code-1996) as an alternative to the 1989 Edition (no Addenda) of Section XI for the IST for pumps and valves.

Section XI of the ASME Code has been revised on a continuing basis over the years to provide updated requirements for the ISI and IST of components. Until 1990, the ASME Code requirements addressing the IST of pumps and valves were contained in Section XI, Subsections IWP (pumps) and IWV (valves). In 1990, the ASME published the initial edition of the OM Code that provides the rules for the IST of pumps and valves. Since the establishment of the 1990 Edition of the OM Code, the rules for the IST of pumps and valves are no longer being updated in Section XI. As identified in NRC SECY-99-017 dated January 13, 1999, the NRC has generally considered the evolution of the ASME Code to result in a net improvement in the measures for inspecting piping and components and testing pumps and valves.

Changes were made to Bases section 3/4.4.2 to clearly identify that the pressurizer Code safety valves will only be tested when removed from the reactor coolant system in accordance with the ASME OM Code. This sentence as revised will not permit testing of the subject valves in-place in the reactor coolant system when the plant is at power but will accommodate testing performed at a vendor's test facility. As a result, there will be no affect on plant safety.

Therefore, the proposed changes to the Technical Specifications and identified Bases sections do not affect plant safety.

Section II

Markups Of Proposed Changes

The attached markup reflects the currently issued revision of the Technical Specifications and Bases listed below. Pending Technical Specifications or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed markup

The following Technical Specifications and Bases are included in the attached markups:

Technical Specification	Title	Page(s)
SR 4.0.5.a		3/4 0-2
SR 4.0.5.b		3/4 0-3
SR 4.0.5.e		3/4 0-3
SR 4.4.6.2.2	Reactor Coolant System Operational Leakage	3/4 4-23
Bases Section 4.0.5		B 3/4 0-6
Bases Section 3/4.4.2	Safety Valves	B 3/4 4-2

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. ~~Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);~~

Insert "A"

Insert A:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i).

Inservice testing of ASME Code Class 1, 2, and 3 components shall be performed in accordance with the Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(f), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(f)(6)(i).

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.5 (Continued)

- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

the ASME OM Code including

the ASME OM Code including

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities

Required frequencies for performing inservice inspection and testing activities

Weekly
Monthly

the ASME OM Code including

Quarterly or every 3 months
Semiannually or every 6 months
Every 9 months
Yearly or annually

At least once per 7 days
At least once per 31 days
At least once per 92 days
At least once per 184 days
At least once per 276 days
At least once per 366 days

Biennially or every 2 years

At least once per 731 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities;

- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements; and

or the ASME OM Code

- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

Semi-quarterly

At least once per 46 days

REACTOR COOLANT SYSTEM

REACTOR COOLANT SYSTEM LEAKAGE

OPERATIONAL LEAKAGE

SURVEILLANCE REQUIREMENTS

4.4.6.2.2 Each Reactor Coolant System Pressure Isolation Valve shall be demonstrated OPERABLE by verifying leakage to be within its limit:

- a. At least once per 18 months,
- b. Prior to entering MODE 2 whenever the plant has been in COLD SHUTDOWN for 7 days or more and if leakage testing has not been performed in the previous 9 months,
- c. Prior to returning the valve to service following maintenance, repair, or replacement work on the valve, and
- d. Within 24 hours following valve actuation due to automatic or manual action or flow through the valve.*
- e. ~~As outlined in the ASME Code, Section XI, paragraph IWB-3427(b).~~
Testing pursuant to Specification 4.0.5.

The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 or 4.

*Not applicable to RHR Pumps 8A and 8B suction isolation valves.

3/4.0 APPLICABILITY

BASES

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply ~~except when relief has been provided in writing by the Commission~~

the ASME OM Code including applicable

the ASME OM Code including

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

the ASME OM Code including

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. ~~The requirements of Specification 4.0.4~~

~~to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of OPERABLE does not allow a grace period before a component, that is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.~~

The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME OM Code provision which allows pumps that can only be tested during plant operation to be tested within 1 week following plant startup.

REACTOR COOLANT SYSTEM

BASES

3/4.4.2 SAFETY VALVES (Continued)

During plant operations in Mode 5, it is conservative and consistent with Technical Specifications that the OPERABLE pressurizer safety valve may be removed from its flange and continue to meet the intent of this Specification. The removal of the pressurizer safety valve will afford the reactor coolant system equivalent or superior protection as an overpressure device. This will also allow the removal of the three pressurizer safety valves to be used as a gravity vent path in place of removing the pressurizer manway when the plant is at reduced inventory conditions.

During operation, all pressurizer Code safety valves must be OPERABLE to prevent the RCS from being pressurized above its Safety Limit of 2735 psig. The combined relief capacity of all of these valves is greater than the maximum surge rate resulting from a complete loss of load assuming no Reactor trip until the first Reactor Trip System Trip Setpoint is reached (i.e., no credit is taken for a direct Reactor trip on the loss of load) and also assuming no operation of the power-operated relief valves or steam dump valves.

~~Demonstration of the safety valves' lift settings will occur only during shutdown and will be performed in accordance with the provisions of Section XI of the ASME Boiler and Pressure Code.~~

3/4.4.3 PRESSURIZER

will be performed when removed from the reactor coolant system in accordance with the provisions of the ASME Code for Operation and Maintenance of Nuclear Power Plants.

The limit on the maximum water volume in the pressurizer assures that the parameter is maintained within the normal steady-state envelope of operation assumed in the SAR. The limit is consistent with the initial SAR assumptions. The 12-hour periodic surveillance is sufficient to ensure that the parameter is restored to within its limit following expected transient operation. The maximum water volume also ensures that a steam bubble is formed and thus the RCS is not a hydraulically solid system. The requirement that a minimum number of pressurizer heaters be OPERABLE enhances the capability of the plant to control Reactor Coolant System pressure and establish natural circulation.

3/4.4.4 RELIEF VALVES

The power-operated relief valves (PORVs) and steam bubble function to relieve RCS pressure during all design transients up to and including the design step load decrease with steam dump. Operation of the PORVs minimizes the undesirable opening of the spring-loaded pressurizer Code safety valves. Each PORV has a remotely operated block valve to provide a positive shutoff capability should a relief valve become inoperable. The PORVs and their associated block valves are powered from Class 1E power supply busses.

The PORVs are equipped with automatic actuation circuitry and manual control capability. The PORVs are considered OPERABLE in either the automatic or manual mode for the following reasons:

- (1) No credit is taken in any FSAR accident analysis for automatic PORV actuation to mitigate the consequences of an accident.

SECTION III

Retypes Of Proposed Changes

The attached retypes reflect the currently issued version of the Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4. Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i).

Inservice testing of ASME Code Class 1, 2, and 3 components shall be performed in accordance with the Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(f), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(f)(6)(i).

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.5 (Continued)

- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda shall be applicable as follows in these Technical Specifications:

<u>ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for performing service inspection and testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Semi-quarterly	At least once per 46 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities;
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements; and
- e. Nothing in the ASME Boiler and Pressure Vessel Code or the ASME OM Code shall be construed to supersede the requirements of any Technical Specification.

REACTOR COOLANT SYSTEM

REACTOR COOLANT SYSTEM LEAKAGE

OPERATIONAL LEAKAGE

SURVEILLANCE REQUIREMENTS

- 4.4.6.2.2 Each Reactor Coolant System Pressure Isolation Valve shall be demonstrated OPERABLE by verifying leakage to be within its limit:
- a. At least once per 18 months,
 - b. Prior to entering MODE 2 whenever the plant has been in COLD SHUTDOWN for 7 days or more and if leakage testing has not been performed in the previous 9 months,
 - c. Prior to returning the valve to service following maintenance, repair, or replacement work on the valve, and
 - d. Within 24 hours following valve actuation due to automatic or manual action or flow through the valve.
 - e. Testing pursuant to Specification 4.0.5.

The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 or 4.

* Not applicable to RHR Pumps 8A and 8B suction isolation valves.

3/4.0 APPLICABILITY

BASES

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME OM Code provision which allows pumps that can only be tested during plant operation to be tested within 1 week following plant startup.

REACTOR COOLANT SYSTEM

BASES

3/4.4.2 SAFETY VALVES (Continued)

During plant operations in Mode 5, it is conservative and consistent with Technical Specifications that the OPERABLE pressurizer safety valve may be removed from its flange and continue to meet the intent of this Specification. The removal of the pressurizer safety valve will afford the reactor coolant system equivalent or superior protection as an overpressure device. This will also allow the removal of the three pressurizer safety valves to be used as a gravity vent path in place of removing the pressurizer manway when the plant is at reduced inventory conditions.

During operation, all pressurizer Code safety valves must be OPERABLE to prevent the RCS from being pressurized above its Safety Limit of 2735 psig. The combined relief capacity of all of these valves is greater than the maximum surge rate resulting from a complete loss of load assuming no Reactor trip until the first Reactor Trip System Trip Setpoint is reached (i.e., no credit is taken for a direct Reactor trip on the loss of load) and also assuming no operation of the power-operated relief valves or steam dump valves.

Demonstration of the safety valves' lift settings will be performed when removed from the reactor coolant system in accordance with the provisions of the ASME Code for Operation and Maintenance of Nuclear Power Plants.

3/4.4.3 PRESSURIZER

The limit on the maximum water volume in the pressurizer assures that the parameter is maintained within the normal steady-state envelope of operation assumed in the SAR. The limit is consistent with the initial SAR assumptions. The 12-hour periodic surveillance is sufficient to ensure that the parameter is restored to within its limit following expected transient operation. The maximum water volume also ensures that a steam bubble is formed and thus the RCS is not a hydraulically solid system. The requirement that a minimum number of pressurizer heaters be OPERABLE enhances the capability of the plant to control Reactor Coolant System pressure and establish natural circulation.

3/4.4.4 RELIEF VALVES

The power-operated relief valves (PORVs) and steam bubble function to relieve RCS pressure during all design transients up to and including the design step load decrease with steam dump. Operation of the PORVs minimizes the undesirable opening of the spring-loaded pressurizer Code safety valves. Each PORV has a remotely operated block valve to provide a positive shutoff capability should a relief valve become inoperable. The PORVs and their associated block valves are powered from Class 1E power supply busses.

REACTOR COOLANT SYSTEM

BASES

3/4.4.4 RELIEF VALVES (Continued)

The PORVs are equipped with automatic actuation circuitry and manual control capability. The PORVs are considered OPERABLE in either the automatic or manual mode for the following reasons:

- (1) No credit is taken in any FSAR accident analysis for automatic PORV actuation to mitigate the consequences of an accident.
- (2) No Surveillance Requirement (ACOT or TADOT) exists for verifying automatic operation.
- (3) The required ACTION for an inoperable PORV(s) (closing the block valve) conflicts with any presumed requirement for automatic actuation.

3/4.4.5 STEAM GENERATORS

The Surveillance Requirements for inspection of the steam generator tubes ensure that the structural integrity of this portion of the RCS will be maintained. The program for inservice inspection of steam generator tubes is based on a modification of Regulatory Guide 1.83, Revision 1. Inservice inspection of steam generator tubing is essential in order to maintain surveillance of the conditions of the tubes in the event that there is evidence of mechanical damage or progressive degradation due to design, manufacturing errors, or inservice conditions that lead to corrosion. Inservice inspection of steam generator tubing also provides a means of characterizing the nature and cause of any tube degradation, so that corrective measures can be taken.

Section IV

Determination Of Significant Hazards For The Proposed Change

IV. DETERMINATION OF SIGNIFICANT HAZARDS FOR THE PROPOSED CHANGE

License Amendment Request (LAR) 00-02 proposes changes to Technical Specification Surveillance Requirements (SR) 4.0.5.a, 4.0.5.b, 4.0.5.e, and 4.4.6.2.2.e. Additionally, LAR 00-02 also proposes changes to Technical Specification Bases sections 4.0.5 and 3/4.4.2. These changes are necessary in order to implement the 2nd Ten-Year Interval Inservice Test (IST) program in accordance with the requirements of the 1995 Edition of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code-1995) including the 1996 Addenda (OMa Code-1996).

Changes are also proposed to Bases section 3/4.4.2 to clarify that the pressurizer Code Safety valves will be only tested when removed from the reactor coolant system in accordance with the requirements of the requirements of the ASME OM Code.

Additional changes are proposed to SR 4.0.5.b to clarify the surveillance interval requirements for components tested on a Semi-quarterly and Biennial frequency.

In accordance with 10 CFR 50.92, North Atlantic has reviewed the attached proposed change and has concluded that it does not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed change does not involve a SHC is as follows:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes to the Technical Specifications to Technical Specification Surveillance Requirements 4.0.5.a, 4.0.5.b, 4.0.5.e, and 4.4.6.2.2.e. and Bases sections 4.0.5 and 3/4.4.2 are being proposed to separate requirements for inservice testing from those applicable to inservice inspection, to clarify that the IST program will be performed in accordance the requirements of SR 4.0.5 and the ASME OM Code instead of Section XI of the ASME Boiler and Pressure Vessel Code, to clarify that the pressurizer Code Safety valves will be only tested when removed from the reactor coolant system and to clarify the surveillance interval requirements for components tested on a Semi-quarterly and Biennial frequency. The proposed changes are administrative in nature and do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, or configuration of the facility.

The existing Technical Specifications require that an Inservice Test (IST) program for certain ASME Code Class 1, 2 and 3 pumps and valves be in place as required by 10 CFR 50.55a. The purposes of inservice testing programs are to assess the operational readiness of pumps and valves, to detect degradation that might affect component operability, and to maintain safety margins with provisions for increased surveillance and corrective action. 10 CFR 50.55a defines the requirements for applying industry codes and standards to each licensed nuclear powered facility. The initial IST program was developed in accordance with NRC regulations (10 CFR 50.55a(f)(4)(i)) to comply with the 1983 Edition of the ASME Boiler and Pressure Vessel Code, including Addenda through the Summer of 1983 and is reflected in the existing Technical Specifications and associated Bases sections.

NRC regulations (10 CFR 50.55a(f)(4)(ii)) also require that the IST programs be revised during successive 120-month intervals to comply with the latest edition and addenda of the Code

incorporated by reference in paragraph (b) 12 months prior to the start of the interval. Since it is intended that the 2nd Ten-Year (120-month) interval will begin on August 18, 2000, a literal interpretation of the regulations would require that the IST program be developed in accordance with the 1989 Edition (no Addenda) of Section XI. ASME OM Code-1995 (including OMa Code-1996) was not incorporated in paragraph (b) until November 22, 1999. North Atlantic has proposed to utilize the ASME OM Code-1995 including the 1996 Addenda (OMa Code-1996) for the IST of pumps and valves as an alternative to the requirements of the 1989 Edition of Section XI pursuant to 10 CFR 50.55a(f)(4)(iv) subject to the limitations modifications listed in paragraph (b). The use of the ASME OM Code-1995 including the 1996 Addenda has been evaluated by the NRC (64 FR 51370) and has supplanted Section XI of the 1989 Edition of the ASME Boiler and Pressure Vessel Code as the Code referenced in paragraph (b) for the IST of pumps and valves effective November 22, 1999.

The separation of the IST program requirements from the ISI program requirements identified in SR 4.0.5.a is consistent with the present structure of 10 CFR 50.55a. A rule change (57 FR 34666) dated August 6, 1992 separated the requirements for IST of pumps and valve from those for Inservice Inspection (ISI) by placing the requirements for IST in a separate paragraph (50.55a(f)).

The proposed changes to SR 4.0.5b are also administrative in nature. A literal interpretation of SR 4.0.5.c identifies that the provisions of Specification 4.0.2 are applicable only to the terms and frequencies specifically identified in the table outlined in 4.0.5.b. Subsections ISTB and ISTC of ASME OM Code-1995 (including OMa Code-1996) have provisions for the Biennial (or 2 year) frequency for comprehensive pump testing and valve position verification testing. Subsection ISTB of the Code has provisions for doubling the quarterly test frequency for pumps determined to be in the alert range. The utilization of the provisions of Specification 4.0.2 for the "Semi-quarterly," and the "Biennially or every 2 years" frequency is consistent with the provisions of SR 3.0.2 as identified in NUREG-1431 "Standard Technical Specifications Westinghouse Plants" which apply to all individual specifications unless otherwise excluded.

Changes were made to Bases section 3/4.4.2 to clearly identify that the pressurizer Code safety valves will only be tested when removed from the reactor coolant system in accordance with the ASME OM Code. This sentence as revised will not permit testing of the subject valves in-place in the reactor coolant system when the plant is at power but will accommodate testing performed at a vendor's test facility during period when the plant is not shutdown. As a result, there will be no affect on plant safety.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The changes to the Technical Specifications to Technical Specification Surveillance Requirements 4.0.5.a, 4.0.5.b, 4.0.5.e, and 4.4.6.2.2.e. and Bases sections 4.0.5 and 3/4.4.2 are being proposed to separate requirements for inservice testing from those applicable to inservice inspection, to clarify that the IST program will be performed in accordance the requirements of SR 4.0.5 and the ASME OM Code instead of Section XI of the ASME Boiler and Pressure Vessel Code, and to clarify the surveillance interval requirements for components tested on a

Semi-quarterly and Biennial frequency. The proposed changes are administrative in nature and do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, or configuration of the facility.

The use of the ASME OM Code-1995 including the 1996 Addenda in lieu of Section XI of the ASME Boiler and Pressure Vessel Code will result in a net improvement in the measures for performing the IST of pumps and valves. The ASME OM Code-1995 including the 1996 Addenda has been evaluated by the NRC (64 FR 51370) and has supplanted Section XI of the ASME Boiler and Pressure Vessel Code as the Code referenced in paragraph (b) for the IST of pumps and valves effective November 22, 1999.

The separation of the IST program requirements from the ISI program requirements identified in SR 4.0.5.a is consistent with the present structure of 10 CFR 50.55a.

The utilization of the provisions of Specification 4.0.2 for the "Semi-quarterly," and the "Biennially or every 2 years" frequency is consistent with the provisions of SR 3.0.2 as identified in NUREG-1431 "Standard Technical Specifications Westinghouse Plants" which apply to all individual specifications unless otherwise excluded.

The changes made to Bases section 3/4.4.2 revise the third paragraph to clearly identify that the pressurizer Code safety valves will only be tested when removed from the reactor coolant system in accordance with the ASME OM Code. This sentence as revised will not permit testing of the subject valves in-place in the reactor coolant system when the plant is at power as was the original intent of the paragraph. The change as worded will accommodate the testing of the pressurizer Code safety valves at a vendor test facility during periods when the plant is not shutdown. Testing performed at a vendor test facility will have no operational impact

Therefore, the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

3. Involve a significant reduction in a margin of safety.

The changes to the Technical Specifications to Technical Specification Surveillance Requirements 4.0.5.a, 4.0.5.b, 4.0.5.e, and 4.4.6.2.2.e. and Bases sections 4.0.5 and 3/4.4.2 do not involve a reduction in the margin of safety. As previously identified the subject changes are administrative in nature and will clarify that the IST program will be performed in accordance the requirements of SR 4.0.5 and the ASME OM Code.

The separation of the requirements of inservice testing from those applicable to inservice inspection as identified in SR 4.0.5a reflect the present structure of 10 CFR 50.55a.

The use of the ASME OM Code-1995 including the 1996 Addenda in lieu of Section XI of the ASME Boiler and Pressure Vessel Code will result in a net improvement in the measures for performing the IST of pumps and valves and has been previously evaluated by the NRC.

The utilization of the provisions of Specification 4.0.2 for the "Semi-quarterly" and the "Biennially or every 2 years" frequency is consistent with the provisions of SR 3.0.2 as identified in NUREG-1431 "Standard Technical Specifications Westinghouse Plants" which apply to all individual specifications unless otherwise excluded.

The changes made to Bases section 3/4.4.2 revise the third paragraph to clearly identify that the pressurizer Code safety valves will only be tested when removed from the reactor coolant system in accordance with the ASME OM Code. This sentence as revised will not permit testing of the subject valves in-place in the reactor coolant system when the plant is at power as was the original intent of the paragraph. The change as worded will accommodate the testing of the pressurizer Code safety valves at a vendor test facility during periods when the plant is not shutdown.

Therefore, the proposed changes to the Technical Specifications and Bases will not result in reduction in the margin of safety.

Based on the above evaluation, North Atlantic concludes that the proposed change does not constitute a significant hazard.

Sections V & VI

**Proposed Schedule for License Amendment Issuance and Effectiveness
and
Environmental Impact Assessment**

V. **PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS**

North Atlantic requests NRC Staff review of License Amendment Request 00-02 and issuance of a license amendment by August 4, 2000, becoming effective on August 18, 2000 and implemented within 30 days thereafter.

VI. **ENVIRONMENTAL IMPACT ASSESSMENT**

North Atlantic has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not involve a significant hazards consideration, nor increase the types and amounts of effluent that may be released off-site, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

ENCLOSURE 2 TO NYN-00006

Alternative Request

North Atlantic is currently performing inservice testing of pumps and valve for the 1st Ten-Year Inservice Test (IST) Interval to the 1983 Edition (including Addenda through Summer 1983) of Section XI of the ASME Boiler and Pressure Vessel (B&PV) Code. 10 CFR 50.55a(f)(5)(i) specifies that the inservice test program for a boiling or pressurized water-cooled nuclear power facility must be revised by the licensee, as necessary, to meet the requirements of paragraph (f)(4). 10 CFR 50.55a(f)(4)(ii) requires Inservice Test programs to be revised during successive 120-month (Ten-Year) intervals to comply with the latest edition and addenda of the Code incorporated by reference in paragraph (b) 12 months prior to the start of the interval.

It is intended that the 2nd Ten-Year (120-month) inservice test program interval will begin on August 18, 2000. The requirements of 10 CFR 50.55a(f)(4)(ii), require that Seabrook Station comply with the 1989 Edition (no Addenda) of Section XI for the 2nd Ten-Year Interval IST program, since it was the latest edition and addenda of the ASME Code referenced in paragraph (b) on August 18, 1999.

However, North Atlantic proposes to utilize the ASME OM Code-1995 (including OMa Code-1996) in its entirety subject to the limitations and modifications listed in paragraph (b)(3) of 10 CFR 50.55a as an alternative to the 1989 Edition (no Addenda) of Section XI for the IST for pumps and valves. This proposal to utilize an alternative code is requested pursuant to the requirements of 10 CFR 50.55a(f)(4)(iv).

The ASME OM Code-1995 (including OMa Code-1996) permits the use of improved methods for the IST of ASME Code Class 1, 2, and 3 pumps and valves. This is evident as a result of the establishment of requirements for the comprehensive testing of pumps and the option of establishing a condition monitoring program in lieu of the traditional methods of testing for check valves. Additionally, the ASME OM Code-1995 (including OMa Code-1996) was recognized as the latest edition and addenda incorporated by reference for IST in paragraph (b)(3) as a result of a rule change (64 FR 51370) effective November 22, 1999. The subject Code and Addenda and will be required for general use by licensees whose revised IST programs begin an initial or successive interval on or after November 22, 2000.