

failure mode analysis, and consultation with the respective system engineer. The evaluations conclude that the subject SSCs are highly reliable, that presently do not exhibit time dependent failure modes of significance, and that there is no indication that the proposed extension could cause deterioration in the condition or performance of the subject SSCs. There are no known mechanisms that would significantly degrade the performance of the evaluated equipment during normal plant operation. Although there have been generic or repetitive failures of some components in the past, which may have affected the ability of the SSCs to consistently and successfully perform their safety function, those items have been resolved through design changes and rework such that they have not recurred. There have been no repetitive failures or time dependent failures that were significant in nature which would have prevented the SSCs from performing their intended safety function.

Deletion of the restriction "during effect on safe operation of the plant is given prior to conduct of a particular surveillance in a condition or mode other than shutdown.

Since the proposed changes only affect the surveillance intervals for SSCs that are used to mitigate accidents [sic], the changes do not affect the probability or consequence of a previously analyzed accident. While the proposed changes will lengthen the intervals between surveillances, the increase in intervals has been evaluated. Based on the reviews of the surveillance tests, inspections, and maintenance activities, it is concluded that there is no significant adverse impact on the reliability or availability of these SSCs.

Since there are no changes to previous accident analyses, the radiological consequences associated with these analyses remain unchanged, therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes do not alter the design assumptions, conditions, configuration of the facility or the manner in which the plant is operated. There are no changes to the source term, containment isolation or radiological release assumptions used in evaluating the radiological consequences in the Seabrook Station UFSAR. Existing system and component redundancy is not being changed by the proposed changes. The proposed changes have no adverse impact on component or system interactions. The proposed changes are administrative in nature and do not change the level of programmatic controls and procedural details associated with the aforementioned surveillance requirements. Therefore, since there are no changes to the design assumptions, conditions, configuration of the facility, or the manner in which the plant is operated and surveilled, the proposed changes do not create the possibility of a new or different kind of accident from any previously analyzed.

3. The proposed changes do not involve a significant reduction in a margin of safety.

There is no adverse impact on equipment design or operation and there are no changes

being made to the Technical Specification required safety limits or safety system settings that would adversely affect plant safety. The proposed changes are administrative in nature and do not change the level of programmatic controls and procedural details associated with the aforementioned surveillance requirements.

From the evaluations performed on the subject SSCs there are no indications that potential problems would be cycle-length dependent or that potential degradation would be significant for the time frame of interest and, therefore, increasing the surveillance interval to the bounding limit of 30 months (24 months plus 25%) will have little, if any, adverse affect on safety.

The proposed changes to the surveillance intervals are still consistent with the basis for the intervals and the intent and method of performing the surveillance is unchanged. Deletion of the restriction "during shutdown" where this restriction is stated will permit performance of certain maintenance and testing activities during conditions or modes other than shutdown. North Atlantic will ensure, through the implementation of appropriate administrative controls, that proper regard to their effect on safe operation of the plant is given prior to conduct of a particular surveillance in a condition or mode other than shutdown. In addition, use of the subject SSCs during normal plant operation, combined with their previous history of availability and reliability, provide assurance that the proposed changes will not affect the reliability of the subject SSCs. Thus, it is concluded that the subject SSCs would be available upon demand to mitigate the consequences of an accident and, therefore, there is no impact on the margin of safety.

The NRC staff has reviewed the licensee's analysis, and based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

*Local Public Document Room*

*location:* Exeter Public Library, Founders Park, Exeter, NH 03833.

*Attorney for licensee:* Lillian M. Cuoco, Esq., Senior Nuclear Counsel, Northeast Utilities Service Company, P.O. Box 270, Hartford, CT 06141-0270.

*NRC Project Director:* Cecil O. Thomas.

*Northeast Nuclear Energy Company, et al., Docket No. 50-336, Millstone Nuclear Power Station, Unit No. 2, New London County, Connecticut*

*Date of amendment request:* July 2, 1998.

*Description of amendment request:* The proposed amendment would revise the updated Final Safety Analysis Report (FSAR) by changing FSAR Sections 9.7.2, "Service Water," and 9.4, "Reactor Building Closed Cooling Water," to discuss the use of various

types of internal protective coatings and liners used in the piping and components of the systems. The proposed change also indicates that periodic maintenance, surveillances, and inspections would be conducted to ensure that coating or liner degradation would be promptly detected and corrected to provide reasonable assurance that the systems can perform their safety-related functions.

*Basis for proposed no significant hazards consideration determination:*

As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

The proposed change does not involve significant hazards consideration because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The SWS [Service Water System] provides cooling water directly or indirectly to a multitude of mitigating and support systems such as safety injection, containment spray, and RBCCW [Reactor Building Closed-Cooling Water]. Therefore either directly or indirectly, the SWS is credited in the mitigation of virtually all analyzed operating events and accidents. However, there are no failures of the SWS which would directly initiate any of the licensing basis accidents. Therefore, the probability of occurrence of accidents previously evaluated is not increased by this activity.

The SWS is comprised of two separate and independent trains, each capable of providing the cooling capacity required for normal and accident operation. Therefore, the failure of a single heat exchanger or train will not influence the consequences of an accident. Only a common mode loss of SWS function could affect accident consequences. It can be postulated that lining material could be released as a result of the SWS response to an accident or as a result of a seismic event, resulting in heat exchanger blockage in both trains (common mode). However, the discussion below provides the basis for concluding that lining degradation will not increase the consequences of an accident.

In response to a Safety Injection Actuation Signal or a Loss of Normal Power event, the quantity of flow in safety related SWS heat exchangers may increase significantly, imparting higher loads on the pipe linings than are typically present during normal operation. In spite of this flow increase, it is considered to be much more likely that any lining degradation will occur and be detected under normal operating conditions, and will be corrected prior to the occurrence of an event of the type discussed above. SWS pump flow surveillances, performed periodically during normal operation, subject significant portions of the SWS to flow levels which equal or exceed those expected to occur during accidents. Any degraded lining material prone to be released during an