FPL Energy
Seabrook Station

FPL Energy Seabrook Station
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September 18, 2006

Docket No. 50-443
SBK-L-06183

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Seabrook Station
Facility Operating License NPF-86

Revision to License Amendment Request 05-08,
"Limited Inspection of the Steam Generator Tube Portion within the Tubesheet," to Narrow the Scope to a One-time Allowance

References:

1. FPL Energy Seabrook, LLC letter SBK-L-05185, License Amendment Request 05-08, Limited Inspection of the Steam Generator Tube Portion within the Tubesheet, September 29, 2005.

2. FPL Energy Seabrook, LLC letter SBK-L-05186, Proprietary Information to Support License Amendment Request 05-08, Limited Inspection of the Steam Generator Tube Portion within the Tubesheet, September 29, 2005.

3. NRC letter to FPL Energy Seabrook, LLC, Draft Request for Additional Information (TAC NO. MC 8554), February 23, 2006.

4. FPL Energy Seabrook, LLC letter SBK-L-06157, Response to Request for Additional Information Regarding License Amendment Request 05-08, Limited Inspection of the Steam Generator Tube Portion within the Tubesheet, August 8, 2006.

By letters dated September 29, 2005, (References 1 and 2) FPL Energy Seabrook, LLC (FPL Energy Seabrook) submitted License Amendment Request 05-08, Limited Inspection of the Steam Generator Tube Portion within the Tubesheet. The proposed change would exclude the region of the steam generator tubes below 17 inches from the top of the hot leg tubesheet from

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the inspection requirements of Technical Specification 3/4.4.5, Steam Generators. In Reference 3, the NRC requested additional information regarding this change, and in Reference 4, FPL Energy Seabrook provided the requested information.

Following a September 7, 2006 telephone conference that discussed the technical content of the requested amendment, the NRC staff determined that further review and evaluation would be required prior to approving the proposed change on a permanent basis. However, the NRC staff indicated that a sufficient basis may exist to issue the amendment as a one-time allowance. Therefore, FPL Energy Seabrook is reducing the scope of LAR 05-08 to a one-time change rather than a permanent change to the Technical Specifications (TS). This scope reduction limits the duration of the proposed change to the period ranging from refueling outage 11 in October 2006 through the subsequent operating cycles until the next scheduled steam generator tube inspection. Enclosure 1 contains mark-ups of the Seabrook Station TS that reflect the revised amendment request, and Enclosure 2 contains the re-typed TS pages.

In Reference 4, FPL Energy Seabrook responded to the NRC staff's request for additional information (RAI) regarding LAR 05-08. In its response to RAI #3, FPL Energy Seabrook agreed to add additional reporting requirements to the 12-month Special Report required by TS Surveillance Requirement 4.4.5.5.b. However, the NRC staff suggested that including the additional reporting information in the 12-month Special Report may not be necessary since the revised LAR is requesting a one-time change. Consequently, Enclosures 1 and 2 make no changes to TS 4.4.5.5 for the 12-month Special Report.

The response to RAI #8 in Reference 4 stated that FPL Energy Seabrook has submitted LAR 06-02, the Generic Licensing Change Package for TSTF–449, to the NRC for approval. As part of that submittal, the operational leakage limit in TS 3.4.6.2 was changed from 500 gallons per day to 150 gallons per day per steam generator. Although LAR 06-02 may not be approved prior to issuance of the one-time change requested in LAR 05-08, FPL Energy Seabrook presently limits operating primary to secondary leakage to 150 gallons per day in accordance with Operating Procedure OS 1227.02, "Steam Generator Tube Leak". The plant is required to shutdown upon reaching 150 gallons per day, which is more conservative than the current technical specification and meets the requirements in TSTF-449.

The duration of the change proposed in this LAR extends through two operating cycles. As a result, FPL Energy Seabrook makes the following commitment for the period that this one-time change to the inspection requirements of Technical Specification 3/4.4.5 is in effect:

> If crack indications are found in any SG tube during refueling outage 11, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.

References 1 and 2 provided the technical and regulatory analyses that support this change. The amendment request transmitted in Reference 1 also included an evaluation of significant hazards consideration in accordance with 10 CFR 50.92 and an environmental assessment in accordance with 10 CFR 51.22. The reduction in scope of the amendment request does not alter the validity of either the significant hazards consideration or the environmental assessment.

The Station Operation Review Committee and the Company Nuclear Review Board have reviewed this revision to LAR 05-08. A copy of this letter has been forwarded to the New Hampshire State Liaison Officer pursuant to 10 CFR 50.91(b).

FPL Energy Seabrook requests NRC Staff review and approval of LAR 05-08 with issuance of a license amendment by the start of refueling outage 11, which begins on October 1, 2006, with implementation of the amendment within 30 days.

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

Very truly yours,

FPL Energy Seabrook, LLC

Gene St. Pierre
Site Vice President

Enclosures (3)

cc: S. J. Collins, NRC Region I Administrator
G. E. Miller, NRC Project Manager, Project Directorate I-2
G. T. Dentel, NRC Resident Inspector

Mr. Christopher M. Pope, Director Homeland Security and Emergency Management
New Hampshire Department of Safety
Division of Homeland Security and Emergency Management
Bureau of Emergency Management
33 Hazen Drive
Concord, NH 03305

OATH AND AFFIRMATION

I, Gene St. Pierre, Site Vice President of FPL Energy Seabrook, LLC, hereby affirm that the information and statements contained within this revision to License Amendment Request 05-08 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

18th day of September, 2006

Gene St Pierre

Gene St. Pierre
Site Vice President

Shirley Sweeney

Notary Public

SHIRLEY SWEENEY
MY COMMISSION EXPIRES OCT. 6, 2009
NOTARY PUBLIC NEW HAMPSHIRE

Enclosure 1 to SBK-L-06183

Mark-up of Technical Specification Pages

SURVEILLANCE REQUIREMENTS

4.4.5.4 Acceptance Criteria

a. As used in this specification:

1) Imperfection means an exception to the dimensions, finish, or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections;

2) Degradation means a service-induced cracking, wastage, wear, or general corrosion occurring on either the inside or outside of a tube;

3) Degraded Tube means a tube containing imperfections greater than or equal to 20% of the nominal wall thickness caused by degradation;

4) % Degradation means the percentage of the tube wall thickness affected or removed by degradation;

5) Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective;

6) Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service and is equal to 40% of the nominal tube wall thickness. INSERT A

7) Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in Specification 4.4.5.3c., above;

8) Tube Inspection means an inspection of the steam generator tube from the point of entry (hot-leg side) completely around the U-bend to the top support of the cold leg ~~and~~ INSERT B

9) Preservice Inspection means an inspection of the full length of each tube in each steam generator performed by eddy-current techniques prior to service to establish a baseline condition of the tubing. This inspection shall be performed prior to initial POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

INSERT A

During refueling outage 11 and the subsequent operating cycles until the next scheduled inspection, this criterion does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tube sheet does not require plugging. During refueling outage 11 and the subsequent operating cycles until the next scheduled inspection, all tubes with degradation identified in the portion of the tube within the region from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be removed from service;

INSERT B

During refueling outage 11 and the subsequent operating cycles until the next scheduled inspection, the portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded; and

Enclosure 2 to SBK-L-06183

Re-typed Technical Specification Pages

SURVEILLANCE REQUIREMENTS

4.4.5.4 Acceptance Criteria

a. As used in this specification:

1) Imperfection means an exception to the dimensions, finish, or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections;

2) Degradation means a service-induced cracking, wastage, wear, or general corrosion occurring on either the inside or outside of a tube;

3) Degraded Tube means a tube containing imperfections greater than or equal to 20% of the nominal wall thickness caused by degradation;

4) % Degradation means the percentage of the tube wall thickness affected or removed by degradation;

5) Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective;

6) Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service and is equal to 40% of the nominal tube wall thickness. During refueling outage 11 and the subsequent operating cycles until the next scheduled inspection, this criterion does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tube sheet does not require plugging. During refueling outage 11 and the subsequent operating cycles until the next scheduled inspection, all tubes with degradation identified in the portion of the tube within the region from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be removed from service;

7) Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in Specification 4.4.5.3c., above;

4.4.5.4 (Continued)

8) Tube Inspection means an inspection of the steam generator tube from the point of entry (hot-leg side) completely around the U-bend to the top support of the cold leg. During refueling outage 11 and the subsequent operating cycles until the next scheduled inspection, the portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded; and

9) Preservice Inspection means an inspection of the full length of each tube in each steam generator performed by eddy-current techniques prior to service to establish a baseline condition of the tubing. This inspection shall be performed prior to initial POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

Enclosure 3 to SBK-L-06183

Regulatory Commitment

The following table identifies those actions committed to by FPL Energy Seabrook in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. James M. Peschel, Regulatory Programs Manager.

REGULATORY COMMITMENT	Due Date / Event
If crack indications are found in any SG tube during refueling outage 11, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.	This commitment applies for the duration that the amendment for the one-time change to TS 3/4.4.5 requested in LAR 05-08 is in effect.