



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 1, 2014

Mr. Kevin Walsh, Site Vice President  
c/o Michael Ossing  
Seabrook Station  
NextEra Energy Seabrook, LLC  
P.O. Box 300  
Seabrook, NH 03874

SUBJECT: SEABROOK STATION, UNIT 1 – REQUEST FOR ADDITIONAL INFORMATION  
REGARDING REQUEST FOR RELIEF 3IR-6 (TAC NO. MF3674)

Dear Mr. Walsh:

By letter dated March 24, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14086A017), NextEra Energy Seabrook, LLC (NextEra or the licensee) requested relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, for pressure testing the reactor vessel head flange seal leak detection piping at Seabrook Station, Unit 1 (Seabrook), for the duration of the third 10-year inservice inspection interval.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3)(ii), the licensee requested to use an alternative on the basis that complying with the system leakage test that is required by the ASME Code, Section XI, Table IWC-2500-1, Examination Category C-H, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The Nuclear Regulatory Commission (NRC) staff has determined that additional information is required to complete its review. The NRC staff's request for additional information (RAI) is contained in the enclosure. A draft of these questions was previously sent to Mr. Mike Ossing of your staff on March 26, 2014, with an opportunity to have a teleconference to ensure that NextEra understood the questions and their regulatory basis, as well as to verify that the information was not previously docketed.

A conference call was held on March 31, 2014, and Mr. Ossing agreed that NextEra would respond to the RAI by April 7, 2014. Please note that if you do not respond to the RAI by the agreed upon date, the NRC staff may reject your request for relief under the provisions of 10 CFR, Section 2.108, "Denial of application for failure to supply information."

K. Walsh

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If you have any questions, please contact me at (301) 415-3100.

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Lamb". The signature is fluid and cursive, with the first name "John" being the most prominent.

John G. Lamb, Senior Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure:  
RAI

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

REQUEST FOR RELIEF 3IR-6

RELIEF FROM ASME CODE, SECTION XI, REQUIREMENTS REGARDING  
THE REACTOR VESSEL HEAD FLANGE SEAL LEAK DETECTION PIPING

NEXTERA ENERGY SEABROOK, LLC

SEABROOK STATION, UNIT 1

DOCKET NUMBER 50-443

1.0 SCOPE

By letter dated March 24, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14086A017), NextEra Energy Seabrook, LLC (NextEra or the licensee) requested relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, for pressure testing the reactor vessel head flange seal leak detection piping at Seabrook Station, Unit 1 (Seabrook), for the duration of the third 10-year inservice inspection (ISI) interval.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3)(ii), the licensee requested to use an alternative on the basis that complying with the system leakage test that is required by the ASME Code, Section XI, Table IWC-2500-1, Examination Category C-H, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The NRC staff has determined that additional information is required to complete its review.

2.0 REQUEST FOR ADDITIONAL INFORMATION

1. On page 4 of the Attachment to the submittal dated March 24, 2014, the second paragraph discusses the Seabrook service history of finding a through-wall leak in the normally inaccessible portions of leak-off line 1-RC-89-1-2501-1". Describe the cause of this through-wall leak and discuss the actions taken to prevent recurrence.
2. In the paragraph discussed in 1 above, the licensee also states, in part, that, ". . . NextEra also commits to additional visual examination . . ." The last sentence of this paragraph states the portions of the "inner and outer leak-off lines that are inaccessible for examination during the pressure test will receive a VT-2 examination by certified VT-2 examiners once every 10-Year ISI interval." As described in the "Applicable Code Requirement" section of your request, Section XI, Table IWC-2500-1, Examination Category C-H, Item No. C7.10 requires the system leakage test with the VT-2 examination be performed once per inspection period (or three times per inspection interval). Elaborate on what additional exams are being performed and whether these are part of the alternative requested or an additional licensee commitment.

Enclosure

3. Describe Seabrook's operating experience with regard to reactor pressure vessel flange O-ring leakage.
4. What actions will be taken when using the proposed alternative to ensure that the leak-off lines are clear of air prior to performance of the VT-2 examination?

K. Walsh

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If you have any questions, please contact me at (301) 415-3100.

Sincerely,

**/RA/**

John G. Lamb, Senior Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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**ADAMS Accession No: ML14085A382**

**\* via e-mail \*\*via memo**

OFFICE	LPL1-2/PM	LPL1-2/LA*	EPNB/BC**	LPL1-2/BC	LPL1-2/PM
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DATE	03/31/14	03/31/14	03/31/14	04/01/14	04/01/14

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