



August 26, 2014  
SBK-L-14154  
Docket No. 50-443

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Seabrook Station

NextEra Energy Seabrook, LLC's Six-Month Status Report in Response to March 12, 2012  
Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation  
(Order Number EA-12-051)

References:

1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012 (ML12056A044)
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012 (ML12221A339)
3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 1, dated August 2012
4. NextEra Energy Seabrook, LLC Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, (Order Number EA-12-051), dated October 26, 2012 (ML12311A012)
5. NextEra Energy Seabrook, LLC Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, (Order Number EA-12-051), dated February 26, 2013 (ML13063A439)
6. NextEra Energy Seabrook, LLC, First Six Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated August 28, 2013 9ADAMS Accession No. ML13247A177).
7. Seabrook Station, Unit 1 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0837), Dated December 4, 2013 (ADAMS Accession No. ML13267A388).

A001  
NRK

8. ML14064A189, "NextEra Energy Seabrook, LLC, Second Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated February 27, 2014 (ADAMS Accession No. ML14064A189).

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to NextEra Energy Seabrook, LLC (NextEra Energy Seabrook). Reference 1 was immediately effective and directs NextEra Energy Seabrook to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the NextEra Energy Seabrook initial status report regarding mitigation strategies. Reference 5 provided the NextEra Energy Seabrook overall integrated plan. Reference 6 provided NextEra Energy Seabrook's first six-month status report. In Reference 7, the NRC requested additional information to enable the continued technical review of the NextEra Energy Seabrook Overall Integrated Plan (OIP). Reference 8 provided an update of milestone accomplishments since the last status report, including changes to the compliance method, schedule, or need for relief and the basis, if any. It also provided responses to the Reference 7 request for additional information to the extent possible.

The attachment to this letter provides the third six-month status update of milestone accomplishments since the last status report, including changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments.

If you have any questions regarding this report, please contact Mr. Michael Ossing, Licensing Manager, at (603) 773-7512.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 26, 2014.

Sincerely,

NextEra Energy Seabrook, LLC



Dean Curtland  
Site Vice President

cc: NRC Region I Administrator  
J.G. Lamb, NRC Project Manager, Project Directorate 1-2  
NRC Senior Resident Inspector  
Director, Office of Nuclear Reactor Regulation  
Ms. Jessica A. Kratchmann, NRR/JLD/PMB, NRC  
Mr. Eric E. Bowman, NRR/DPR/PGCB

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

Mr. John Giarrusso, Jr., Nuclear Preparedness Manager  
The Commonwealth of Massachusetts  
Emergency Management Agency  
400 Worcester Road  
Framingham, MA 01702-5399

Attachment to SBK-L-14154

NextEra Energy Seabrook, LLC's Six-Month Status Report in Response to March 12, 2012  
Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation  
(Order Number EA-12-051)

## **ATTACHMENT**

### **1.0 INTRODUCTION**

By letter dated February 26, 2013 (Agency wide Documents Access and Management System (ADAMS) Accession No. ML13063A439), NextEra Energy Seabrook, LLC (NextEra, the licensee) submitted an Overall Integrated Plan (OIP) for the Seabrook Nuclear Plant in response to the March 12, 2012, U.S. Nuclear Regulatory Commission (NRC) Order modifying licenses with regard to requirements for Reliable Spent Fuel Pool (SFP) Instrumentation (Order Number EA-12-051; ADAMS Accession No. ML12056A044). This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule or need for relief/relaxation and the basis.

### **2.0 MILESTONE ACCOMPLISHMENTS**

- Commence Engineering and Design – This milestone is in progress. Seabrook has selected SFP level instrumentation that will be used to meet the criteria delineated in the Overall Integrated Plan.
- Submit First 6 month update – Complete
- Submit Second 6 month update – Complete
- Submit Third 6 month update – Complete

### **3.0 MILESTONE SCHEDULE STATUS**

There currently are no changes to the Milestone Schedule provided in the Overall Integrated Plan (Reference 2). Any changes to the following target dates will be reflected in the six month updates.

The current milestones are:

- |  |                    |
|--|--------------------|
| • Complete Engineering and Design                | 4Q 2014 (December) |
| • Submit Fourth 6 Month Update                   | 1Q 2015 (February) |
| • Complete Procurement of SFP Instruments        | 1Q 2015 (March)    |
| • Complete Installation/ Instruments Operational | 3Q 2015 (August)   |
| • Submit Fifth 6 Month Update                    | 3Q 2015 (August)   |
| • Second Refueling Outage                        | 3Q 2015 (October)  |
| • Training Complete                              | 3Q 2015 (October)  |

Required implementation date: 3Q 2015 (Refueling Outage 17)

#### **4.0 CHANGES TO COMPLIANCE METHOD**

There currently are no changes to the compliance method documented in the Overall Integrated Plan (Reference 2). Consistent with the requirements of Order EA-12-051 and the Order guidance documents, the six month reports will delineate any proposed changes to compliance methods.

#### **5.0 NEED FOR RELIEF/ RELAXATION AND BASIS**

Seabrook is not requesting relief from the requirements of Order EA-12-051 or guidance document JLD-ISG-2012-03 (Reference 4) at this time.

Consistent with the requirements of Order EA-12-051 (Reference 2) and the guidance in NEI 12-02 (Reference 5), the six month reports will delineate progress made, any proposed changes in compliance methods, updates to the schedule, and if needed, requests for relief and their bases.

#### **6.0 REQUESTS FOR ADDITIONAL INFORMATION**

The NRC staff determined that additional information was required to enable the continued technical review of the NextEra Energy Seabrook, LLC (NextEra) Overall Integrated Plan (OIP). Table 1 provides a summary of the status of the request for additional information that was received on December 4, 2013 (Reference 10). Responses that are identified as being “In Progress” in the table require design information that is not available at this time. As details are developed the responses to these requests for information will be uploaded to ePortal for NRC staff review as part of the audit process. Responses to the remaining items were included in a previous six month update (Reference 10).

**Table 1**

<b>Open RAIs</b>	<b>Status</b>
RAI-1 – Level	Included in Reference 10
RAI-2 – Cable Routing	Included in Reference 10
RAI-3 a, b, c – Mounting	In progress*
RAI-4 – Mounting	In progress*
RAI-5 - Mounting	Included in Reference 10
RAI-6 a, b, c – Qualification	In progress*
RAI-7 – Qualification	In progress*
RAI-8 – Independence	In progress*
RAI-9 – Power Supply	In progress*
RAI-10 – Accuracy	In progress*
RAI-11 – Testing and Calibration	In progress*
RAI-12 – Display	In progress*
RAI-13 - Procedures	Included in Reference 10
RAI-14a, b, c – Maintenance and Testing	Included in Reference 10
RAI-15 – Testing and Calibration	In progress*

\* All information will not be available for Seabrook to be able to provide by the date requested in the ISE: October 31, 2014. Seabrook will upload all information to the ePortal prior to the onsite audit which is to be scheduled in 2015.

## **References**

1. NRC Electronic Mail to NextEra Energy Seabrook, LLC, "Draft Requests for Additional Information Regarding the Seabrook Overall Integrated Plan for Reliable SFP Instrumentation, dated July 18, 2013 (ADAMS Accession No. ML13217A166).
2. NextEra Energy Seabrook, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2013 (ADAMS Accession No. ML13063A439).
3. NextEra Energy Seabrook, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 22, 2013 (ADAMS Accession No. ML13063A438).
4. NRC JLD-ISG-2012-03, Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation, Revision 0, August 29, 2012 (ADAMS Accession No. ML12221A339).
5. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1, August 2012.
6. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, August 2012.
7. NRC Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ADAMS Accession No ML12056A044).
8. NextEra Energy Seabrook, LLC, First Six Month Status Report for the Implementation of Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation ," dated August 28, 2013 (ADAMS Accession No. ML13247A177).
9. Seabrook Station, Unit 1 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0837), Dated December 4, 2013 (ADAMS Accession No. ML13267A388).
10. ML14064A189, "NextEra Energy Seabrook, LLC, Second Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated February 27, 2014 (ADAMS Accession No. ML14064A189).