



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

May 19, 2016

Mr. Eric McCartney  
Site Vice President  
Seabrook Station  
NextEra Energy  
626 Lafayette Rd.  
Seabrook, NH 03874

SUBJECT: SEABROOK STATION, UNIT NO. 1 – SUPPLEMENTAL INFORMATION  
NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION  
RE: REQUEST TO EXTEND CONTAINMENT LEAKAGE TEST FREQUENCY  
(CAC NO. MF7565)

Dear Mr. McCartney:

By letter dated March 31, 2016, NextEra Energy Seabrook, LLC (NextEra) submitted a license amendment request for the Seabrook Station, Unit No. 1. The proposed amendment would revise Technical Specification 6.15, "Containment Leakage Rate Testing Program," to require a program that is in accordance with Nuclear Energy Institute (NEI) Topical Report NEI 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J." This proposed change will allow extension of the Type A test interval up to one test in 15 years and extension of the Type C test interval up to 75 months, based on acceptable performance history as defined in NEI 94-01, Revision 3-A. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following, as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that NextEra supplement the application to address the information requested in the enclosure by May 31, 2016. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with

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the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated timeframe in this letter were discussed with Mr. Michael Ossing of your staff on May 16, 2016.

If you have any questions, please contact me at (301) 415-2048 or [Justin.Poole@nrc.gov](mailto:Justin.Poole@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'JP', with a long horizontal flourish extending to the right.

Justin C. Poole, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure:

cc w/enclosure: Distribution via Listserv

SUPPLEMENTAL INFORMATION NEEDED

AMENDMENT REQUEST TO EXTEND CONTAINMENT LEAKAGE TEST FREQUENCY

NEXTERA ENERGY SEABROOK, LLC

SEABROOK STATION, UNIT NO. 1

DOCKET NO. 50-443

**Background**

By letter dated March 31, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16095A278), NextEra Energy Seabrook, LLC (NextEra) submitted a license amendment request (LAR) for the Seabrook Station, Unit No. 1 (Seabrook), to revise Technical Specification (TS) 6.15, "Containment Leakage Rate Testing Program." The proposed amendment would revise the TS to require a containment leakage rate testing program that is in accordance with Nuclear Energy Institute (NEI) Topical Report NEI 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J" (ADAMS Accession No. ML12221A202).

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the LAR and concluded that the following information is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment and exemption in terms of regulatory requirements and the protection of public health and safety and the environment.

**EMCB-1**

Section 3.2.1.2 of your submittal states that Seabrook has committed, as part of its license renewal, to maintain the exterior surface of the Containment Structure from elevation -30 feet to +20 feet, in a dewatered state. NRR Office Instruction LIC-109, "Acceptance Review Procedures" (ADAMS Accession No. ML091810088), notes that a requested licensing action should not be accepted if it is contingent upon another review. The license renewal review is not complete, and the adequacy of associated commitments has not been determined by the NRC staff.

Please provide additional explanation of why the dewatering is relevant to this LAR, and if relevant, how this action is being tracked under the current licensing basis.

**EMCB-2**

NEI 94-01, Revision 3-A, Section 9.2, notes that a visual examination shall be conducted of accessible surfaces of the containment for structural problems that may affect either the containment leakage integrity or the performance of the Type A test. Section 3.2.1.2 of your submittal provides a very high-level summary of the Alkali-Silica Reaction (ASR) concrete degradation indications on the containment structure; however, no discussion is provided about the impacts of the degradation on the containment structure.

Enclosure

Please discuss the ASR degradation impact on the containment, including justification for extending the Type A test interval, considering that the previous test was conducted before ASR indications were identified on the containment building.

#### APLA-1

The LAR specifies that the technical basis for the proposed change utilizes a risk impact evaluation yielding results within the limits set forth by EPRI Technical Report (TR) TR-1009325, Revision 2, "Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals" (ADAMS Accession No. ML072970208). The NRC safety evaluation report for the EPRI TR (ADAMS Accession No. ML081140105) directs the licensee to submit documentation indicating that the technical adequacy of its probabilistic risk assessment (PRA) is consistent with the requirements of RG 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities" (ADAMS Accession No. ML090410014), relevant to the integrated leak rate test extension application. RG 1.200, Revision 2, states that to demonstrate the technical adequacy of the PRA used in an application is of sufficient quality, a discussion of the resolution of pertinent PRA peer review findings and observations (F&Os) must be included.

While Attachment 4, Appendix A, of your submittal provides a high-level summary of industry peer reviews and self-assessments, specific applicable Seabrook F&Os were not included. Thus, to demonstrate the technical adequacy of the Seabrook PRA against RG 1.200, Revision 2, submit a list of all F&Os cited as findings from the latest full- and focused-scope peer reviews that were conducted for any hazard for which a PRA model exists and was peer reviewed, including any self-assessments that were not closed by a subsequent peer review and for which the PRA failed to meet Capability Category I (CC I) of the applicable PRA standard supporting requirements, including any cited as not met. For each F&O, include details regarding its disposition and an explanation of why not meeting the corresponding CC I requirement has no impact on the application.

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the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

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If you have any questions, please contact me at (301) 415-2048 or [Justin.Poole@nrc.gov](mailto:Justin.Poole@nrc.gov).

Sincerely,

/RA/

Justin C. Poole, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure:

cc w/enclosure: Distribution via Listserv

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**ADAMS Accession No.: ML16139A181 \*per e-mail dated 5/6/16 \*\*per e-mail dated 4/25/16**

OFFICE	NRR/DORL/LPL1-2/PM	NRR/DORL/LPL1-2/LA	NRR/DE/EMCB/BC(A)*
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DATE	5/19/2016	5/19/2016	5/6/2016
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NAME	SRosenberg	DBroadus (AHon for)	JPoole
DATE	4/25/16	5/19/2016	5/19/2016

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