



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

December 21, 2016

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

SUBJECT: SEABROOK STATION, UNIT 1 – INTERIM STAFF RESPONSE TO
REEVALUATED FLOOD HAZARDS SUBMITTED IN RESPONSE TO
10 CFR 50.54(f) INFORMATION REQUEST – FLOOD-CAUSING MECHANISM
REEVALUATION (CAC NO. MF6782)

Dear Mr. McCartney:

The purpose of this letter is to provide a summary of the U.S. Nuclear Regulatory Commission (NRC) staff's assessment of the reevaluated flood-causing mechanisms described in the November 7, 2016, flood hazard reevaluation report (FHRR) submitted by NextEra Energy Seabrook, LLC (the licensee) for Seabrook Station, Unit 1 (Seabrook) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16314D429).

By letter dated March 12, 2012, the NRC issued a request for information pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter referred to as the 50.54(f) letter) (ADAMS Accession No. ML12053A340). The request was issued as part of implementing lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 2 to the 50.54(f) letter requested that licensees reevaluate flood-causing mechanisms using present-day methodologies and guidance. Concurrent with the reevaluation of flooding hazards, licensees were required to develop and implement mitigating strategies in accordance with NRC Order EA-12-049, "Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A735). On March 30, 2015, the Commission provided the staff requirements memorandum (SRM) (ADAMS Accession No. ML15089A236) to COMSECY-14-0037, "Integration of Mitigating Strategies for Beyond-Design-Basis External Events and the Reevaluation of Flooding Hazards," dated November 21, 2014 (ADAMS Accession No. ML14309A256), affirming that licensees need to address the reevaluated flooding hazards within their mitigating strategies for beyond-design-basis external events.

Revision 2 of Nuclear Energy Institute (NEI) guidance document NEI 12-06, dated December 2015, includes a methodology for performing a mitigating strategies assessment (MSA) with respect to the reevaluated flood hazards. On February 29, 2016, the NRC staff published Japan Lessons-Learned Division (JLD) Interim Staff Guidance (ISG) JLD-ISG-2012-01, Revision 1, "Compliance with Order EA-12-049, 'Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events'" (ADAMS Accession No. ML15357A142), in the *Federal Register* (81 FR 10283). This ISG endorses Revision 2 of NEI 12-06 (ADAMS Accession No. ML16005A625). Based on the

guidance provided in Revision 2 of NEI 12-06, flood event duration parameters and applicable flood associated effects should be considered as part of the Seabrook MSA. The NRC staff will evaluate the flood event duration parameters (including warning time and period of inundation) and flood-related associated effects developed by the licensee during the NRC staff's review of the MSA.

In addition to the MSA, in order to complete its response to the information requested by Enclosure 2 to the 50.54(f) letter, the licensee is expected to submit an integrated assessment or a focused evaluation, as appropriate, to address the reevaluated flood hazards that exceed the current design basis, as described in the NRC letter, "Coordination of Request for Information Regarding Flooding Hazard Reevaluation and Mitigating Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML15174A257). This letter describes the changes in the NRC's approach to the flood hazard reevaluations that were approved by the Commission in its SRM to COMSECY-15-0019, "Closure Plan for the Reevaluation of Flooding Hazards for Operating Nuclear Power Plants" (ADAMS Accession No. ML15209A682).

The NRC staff has reviewed the information submitted by the licensee in its FHRR and has summarized the results of the review in the tables provided as an enclosure to this letter. Table 1 provides the current design-basis flood hazard mechanisms. Table 2 provides the reevaluated flood hazard mechanisms; however, the reevaluated flood hazard mechanisms bounded by the current design basis (Table 1) are not included. The NRC staff has concluded that the licensee's reevaluated flood hazards information, as summarized in the enclosure, is suitable for the assessment of mitigating strategies developed in response to Order EA-12-049 (i.e., defines the mitigating strategies flood hazard information described in Nuclear Energy Institute (NEI) guidance document NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide") for Seabrook. Further, the NRC staff has concluded that the licensee's reevaluated flood hazard information is a suitable input for other flooding assessments associated with the 50.54(f) letter. The NRC staff plans to issue a staff assessment documenting the basis for these conclusions at a later time.

If you have any questions, please contact me at (301) 415-1056 or e-mail at Lauren.Gibson@nrc.gov.

Sincerely,



Lauren Gibson, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure:

Summary of Results of Flooding
Hazard Re-Evaluation Report

cc w/encl: Distribution via Listserv

SEABROOK STATION, UNIT 1 – INTERIM STAFF RESPONSE TO REEVALUATED FLOOD
HAZARDS SUBMITTED IN RESPONSE TO 10 CFR 50.54(f) INFORMATION
REQUEST – FLOOD-CAUSING MECHANISM REEVALUATION DATED December 21, 2016

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ADAMS Accession Nos.: PKG: ML16356A479; LTR: ML16356A468; ENCL: ML16347A175 ***via email**

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