



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

December 29, 2017

Mr. Mano Nazar
President and Chief Nuclear Officer
Nuclear Division
NextEra Energy Seabrook, LLC
Mail Stop: EX/JB
700 Universe Blvd.
Juno Beach, FL 33408

SUBJECT: SEABROOK STATION, UNIT NO. 1 – WITHDRAWAL OF REQUESTED
LICENSING ACTION RE: AMENDMENT TO DELETE OPERATOR ACTION
AND REQUEST FOR EXEMPTION SUBMITTED TO NRC FOR ACCEPTANCE
REVIEW (EPID L-2017-LLA-0353 AND EPID L-2017-LLE-0028)

Dear Mr. Nazar:

By letter dated October 10, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17283A398), as supplemented by letter dated December 14, 2017 (ADAMS Package Accession No. ML17348A865), NextEra Energy Seabrook, LLC (NextEra) submitted a license amendment and exemption request for Seabrook Station, Unit No. 1 (Seabrook). The proposed amendment would update the fire protection program to remove a commitment to perform an operator action to trip the station offsite power circuit breakers during a fire in the train A switchgear room. The December 14, 2017, supplement removed the request for exemption. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of the NextEra 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.

By letter dated December 27, 2017 (ADAMS Accession No. ML17361A319), you requested to withdraw the application from NRC review. The NRC acknowledges your request to withdraw the application. NRC staff activities on the review have ceased and the associated Enterprise Project Identifiers have been closed.

The NRC staff notes the supplement provided by letter dated December 14, 2017, was unresponsive to the cited informational needs found in the staff's letter dated November 29, 2017, (ADAMS Accession No. ML17332A341). Specifically, your responses to TECH2, TECH6,

and TECH7 were either not responsive to the questions asked or lacked sufficient information such that it is unlikely that the NRC staff could complete its detailed technical review in an appropriate timeframe, given the information insufficiencies. For example, in the case of TECH6, while your response provided other trip capabilities, there was no supporting information regarding whether or not these other capabilities were susceptible to the same fire damage as the shunt cable trip, which information the question asked for. Without this information, the NRC staff has no basis to consider that those other trip capabilities would remain available in the event of a fire that damages the manual trip (shunt trip) cables. The responses to TECH2 and TECH7 indicate to the NRC staff indicate that there are deficiencies related to the use of NRC guidance or completeness of technical analysis, or both.

Additionally, the NRC identified that your response to REG2 contained apparently conflicting statements. At one point in the response you state, "...deletion of the operator action to trip the station offsite power breakers for a fire in the train A essential switchgear room is adverse to the fire protection program (FPP) in that a manual action that utilizes a circuit protected from damage is being replaced with credit for operation of a circuit that may be subject to fire damage." However, later on in your response, you state, "...removal of the operator action to trip the station offsite power breakers and the deviation from BTP CMEB 9.5.1 separation requirements are justified and do not adversely affect the ability to achieve and maintain safe shutdown conditions in the event of a fire." Given these apparently conflicting statements, the NRC staff is uncertain whether it is the NextEra position that the proposed changes adversely impact Seabrook's ability to achieve and maintain shutdown.

Therefore, should you decide to re-submit the request, the NRC staff expects that these comments be adequately addressed.

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

Sincerely,

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

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

Docket No. 50-443

cc: Distribution via Listserv

M. Nazar

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