

## **NRR-DRMAPEm Resource**

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**From:** Poole, Justin  
**Sent:** Wednesday, October 23, 2019 3:21 PM  
**To:** Browne, Kenneth; Thomas, Christine  
**Cc:** Danna, James  
**Subject:** Request for Additional Information Related to Seabrook Inverter Amendment (L-2019-LLA-0216)  
**Attachments:** L-2019-LLA-0216 RAIs.pdf

Ken/Christine,

By letter dated October 3, 2019, (Agencywide Documents Access and Management Systems Accession No. ML19276G055), NextEra Energy Seabrook LLC (NextEra, the licensee), submitted a license amendment request to revise Technical Specification (TS) 3.8.3.1, "Onsite Power Distribution – Operating." In reviewing the submitted information, the U. S. Nuclear Regulatory Commission (NRC) staff had developed DRAFT requests for additional information (RAIs).

On October 21, 2019, the NRC staff sent NextEra the DRAFT RAIs to ensure that the questions are understandable, the regulatory basis is clear, there is no proprietary information contained in the RAI, and to determine if the information was previously docketed. On October 23, 2019, the NRC and NextEra held a clarifying call. During a follow-up call later that day, NextEra requested a response date of October 30, 2019. The NRC staff informed NextEra that this date is acceptable. The attached is the final version of the RAIs. These RAIs will be put in ADAMS as a publicly available document.

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*Project Manager*  
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**From:** Poole, Justin  
**Created By:** Justin.Poole@nrc.gov

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Tracking Status: None  
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Tracking Status: None

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**APLC RAI 01 – Tier 2 and Tier 3: AVOIDANCE OF RISK-SIGNIFICANT PLANT CONFIGURATIONS and the Configuration Risk Management Program (CRMP)**

Regulatory Guide (RG) 1.177, Revision 1, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," identifies a three-tiered approach for the evaluation of the risk associated with a proposed Completion Time (CT) [or allowed outage time (AOT)] TS change.

The Tier 3 evaluation ensures the configuration risk management program (CRMP or maintenance rule) is adequate when maintenance is about to commence, whereas the Tier 2 evaluation is meant to be an early evaluation to identify and preclude potentially high-risk plant configurations that could result if equipment, in addition to that associated with the proposed license amendment, are taken out of service simultaneously, or if other risk significant operational factors, such as concurrent system or equipment testing, are also involved. To distinguish between Tier 2 and Tier 3 reliance on the CRMP, and address Tier 2 in its entirety, address the following observations:

- a. The table provided in Section 3.3 provides a list of risk-significant functions affected by the unavailability of EDE-I-1E. The licensee further states, "[p]rocedure OS1247.02, Loss of 120 V AC Vital Instrument Bus PP-1E or PP-1F, Revision 16, was reviewed to determine what potentially risk significant functions would be impacted by the loss of bus PP1E," however the License Amendment Request (LAR) does not describe the process or criteria considered in the review to identify the risk-significant functions included in the table. Qualitative review of an operational procedure to identify risk significant functions in lieu of a probabilistic risk analysis (PRA) model does not appear to consider all the interfacing system functions or all potential plant configurations that could be impacted, rather just those procedurally addressed in OS1247.02.

Describe how the list of risk-significant functions/conditions considered in the PRA affected by the unavailability of EDE-I-1E were initially identified (e.g., importance factors, etc.). Include the criteria used (e.g., Risk Achievement Worth (RAW) and Risk Reduction Worth (RRW) thresholds values, etc) to assess the risk significance. Include in the discussion, the process used to identify the testing or maintenance activities that could potentially cause a plant transient listed as compensatory action No. 1 in Section 3.2 of the LAR.

- b. The licensee provided six compensatory actions in Section 3.2. Section 3.0 of the LAR states that no specific contingency actions are required for each of the vital panel EDE-PP-1E specified functions and Section 3.2.4 of the LAR further states, "[p]otentially risk significant plant configurations will not occur during the proposed one-time AOT extension." Reliance on the CRMP is more appropriate for the Tier 3 evaluation, which ensures that adequate programs and procedures are in place for the identified risk-significant plant configurations and ensures that appropriate actions are taken to avoid such configurations. To address the Tier 2 evaluation in its entirety, provide the following:
  - i. Confirm/clarify for compensatory action No. 2 in Section 3.2 of the LAR that no testing or surveillances is intended to be performed on "all" inverters during the extended AOT. For the confirmation, include a list of each inverter that the compensatory action is intended to address.

## **APLC RAI 02 – Closure of Facts and Observations (F&Os)**

Section 3.3 of the LAR states, in part, “[i]n October 2017, all resolved findings were reviewed to Appendix X to NEI 05-04, 07-12, and NEI 12-13, “Close-Out of Facts and Observations (F&Os) as accepted by NRC in the staff memorandum dated May 3, 2017 (ML17079A427).” Provide the following information to clarify and confirm that the F&O closure review was performed consistent with accepted Appendix X guidance (Agencywide Document Access Management System (ADAMS) Accession No. ML16158A035).

- a. Confirm that the closure review team was provided with a written assessment and justification of whether the resolution of each F&O, within the scope of the independent assessment, constitutes a PRA upgrade or maintenance update, as defined in ASME/ANS RA-Sa-2009 and qualified by RG 1.200, Revision 2. If the written assessment and justification for the determination of each F&O was not performed and reviewed by the F&O closure review team, provide the list of all F&O’s that were closed using the Appendix X process along with a disposition for each F&O that includes discussion of the impact to the requested AOT extension.
- b. Confirm whether the F&O closure review scope included all finding-level F&Os, including those finding-level F&Os that are associated with “Met” Supporting Requirements (SRs) at capability category (CC)-II. If not, identify and describe those “MET” findings that were excluded from the F&O closure review scope. For each identified finding-level F&O, provide the disposition and the impact of the F&O on the PRA as it pertains to the requested AOT extension.