FPL Energy
Seabrook Station

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FEB 3 2004

Docket No. 50-443

NYN-03091

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Seabrook Station
License Amendment Request 03-04
"Change to Technical Specification SR 4.8.1.1.2a.5)"

FPL Energy Seabrook, LLC (FPLE Seabrook) is providing within the enclosed, License Amendment Request (LAR) 03-04. LAR 03-04 is submitted pursuant to the requirements of 10 CFR 50.4 and 10 CFR 50.90. This LAR proposes to revise Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2a.5) and its associated Bases section.

As discussed in Section IV of the enclosed, the proposed change does not involve a significant hazards consideration pursuant to 10 CFR 50.92. A copy of this letter and the enclosed LAR has been forwarded to the New Hampshire State Liaison Officer pursuant to 10 CFR 50.91(b). FPLE Seabrook requests Nuclear Regulatory Commission (NRC) Staff review of LAR 03-04 and issuance of a license amendment by January 30, 2005 (see Section V of the enclosed).

FPLE Seabrook has determined that LAR 03-04 meets the criterion of 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Review (see Section VI of the enclosed).

The Station Operation Review Committee and the Company Nuclear Review Board have reviewed LAR 03-04.

A001

Should you have any questions regarding this letter, please contact Mr. James M. Peschel, Regulatory Programs Manager, at (603) 773-7194.

Very truly yours,
FPL Energy Seabrook, LLC

Mark E. Warner
Site Vice President

cc:

H. J. Miller, NRC Regional Administrator
V. Nerses, NRC Project Manager, Project Directorate I-2
G.T. Dentel, NRC Senior Resident Inspector

Mr. Bruce Cheney, Director
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State Office Park South
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Enclosure to NYN-03091

FPL Energy
Seabrook Station

SEABROOK STATION UNIT 1

Facility Operating License NPF-86
Docket No. 50-443

License Amendment Request 03-04
"Change to Technical Specification SR 4.8.1.1.2a.5)"

This License Amendment Request is submitted by FPL Energy Seabrook, LLC pursuant to the requirements of 10 CFR 50.4 and 10CFR 50.90. The following information is enclosed in support of this License Amendment Request:

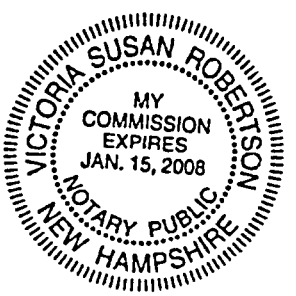
- Section I - Introduction and Safety Assessment for Proposed Changes
- Section II - Markup of Proposed Changes
- Section III - Retype of Proposed Changes
- Section IV - Determination of Significant Hazards for Proposed Changes
- Section V - Proposed Schedule for License Amendment Issuance And Effectiveness
- Section VI - Environmental Impact Assessment

I, Mark E. Warner, Site Vice President of FPL Energy Seabrook, LLC affirm that the information and statements contained within this License Amendment Request are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

Mark E. Warner
Site Vice President

Sworn and Subscribed
before me this
3rd day of February, 2004

Victoria Susan Robertson
Notary Public



SECTION I

INTRODUCTION AND SAFETY ASSESSMENT FOR PROPOSED CHANGES

I. INTRODUCTION AND SAFETY ASSESSMENT OF PROPOSED CHANGES

A. Introduction

FPL Energy Seabrook, LLC (FPLE Seabrook) proposes to revise to revise footnote (***) of Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2a.5) and its associated Bases section. This surveillance requirement ensures that the Emergency Diesel Generator (EDG) is capable of starting from standby conditions and attaining rated voltage and frequency. SR 4.8.1.1.2a.5) is modified by footnote (***) which requires the EDG to be gradually loaded per SR 4.8.1.1.2a.6) immediately following the performance of this SR. In addition, footnote (***) allows a modified start procedure to be used in lieu of the 10-12 seconds "fast start" for the EDG. When the modified start is not implemented, footnote *** requires that the time, voltage, and frequency tolerances of SR 4.8.1.1.2e) (10 second start) be met.

The unloaded testing of each EDG unit is performed on a monthly basis (at least once per 31 days on a staggered test basis) pursuant to SR 4.8.1.1.2a.5). The loaded testing of each EDG unit is also performed on a monthly basis pursuant to SR 4.8.1.1.2a.6). As required by footnote (***), the performance of the loaded surveillance run of each EDG unit must immediately follow the unloaded surveillance.

The performance of SR 4.8.1.1.2a.5) may also be required as a result of an entry into action statement b. or c. of TS 3.8.1.1 due to the inoperability of one of the EDG units. Action statement b. and c. require starting of an operable EDG unit within 24 and 8 hours respectively of identification of a potential common mode failure. Literal compliance with the wording of first sentence of footnote (***), as currently written, also requires loading and operating the operable EDG for at least 60 minutes at the required conditions.

The subject footnote was originally proposed for addition to the Seabrook Station Technical Specifications in License Amendment Request (LAR) 01-01 (NYN-01018) dated February 28, 2001. The Nuclear Regulatory Commission (NRC) subsequently approved LAR 01-01 on March 7, 2002 as Amendment 80 of Facility Operating License. The purpose of first sentence of footnote (***) was to provide a link between SR 4.8.1.1.2a.5) and SR 4.8.1.1.2a.6) for human factoring purposes. Footnote (****) to SR 4.8.1.1.2a.6) (located on the following page of the TS (3/4 8-4)) requires that the loaded surveillance test be preceded by and immediately follow without shutdown a successful performance of an unloaded "fast start" or "modified start" of a EDG unit to credit satisfactory performance of the loaded surveillance test of the EDG unit. It was identified during the Seabrook Station management review of LAR 01-01 that an EDG unit may be shutdown prior to the performance of the loaded surveillance run because footnote (****) to SR 4.8.1.1.2a.6 was located on the following page.

However, an unintended effect of the addition of the first sentence of footnote (***) was that it also created a link between actions b. and c. of TS 3.8.1.1 and the loaded surveillance testing requirements of SR 4.8.1.1.2a.6). Retaining the link between action statement b. and c. of TS 3.8.1.1 and SR 4.8.1.1.2a.6) is undesirable. The Seabrook Station design incorporates the use of two independent EDG units to supply back-up power to the plant's independent safety related busses. Action statement b. or c. of TS 3.8.1.1 would be entered in the event of declaring an EDG unit inoperable during Operational Modes 1, 2, 3, and 4. In this condition, literal compliance with the wording of first sentence of footnote (***) requires loading and operating the only operable EDG for at least 60 minutes connected to the off-site power grid. When the only operable EDG unit is operating and paralleled to the off-site power system, it may be vulnerable to offsite grid disturbances.

B. Description of Proposed Amendment

FPLE Seabrook proposes to delete the first sentence of footnote (***) of SR 4.8.1.1.2a.5) and to revise the second sentence to read as follows: "A modified start involving idling and gradual acceleration to synchronous speed may be used for this surveillance." The remainder of footnote (***) will not be changed.

FPLE Seabrook also proposes to delete the second sentence of the Bases section SR 4.8.1.1.2a.5) and revise the third sentence to read as follows: "Footnote *** allows a modified start procedure to be used in lieu of the 10-12 seconds "fast start" for the EDG."

C. Safety Assessment of Proposed Changes

There are no adverse safety consequences as a result of the proposed change to the wording of footnote (***) of SR 4.8.1.1.2a.5). As identified in the Technical Specification Bases, SR 4.8.1.1.2a.5) ensures that the EDG is capable of starting from standby conditions and attaining rated voltage and frequency. The SR is modified by footnote (***) which requires the EDG to be gradually loaded per SR 4.8.1.1.2a.6) immediately following the performance of this SR. In addition, footnote (***) allows a modified start procedure to be used in lieu of the 10-12 seconds "fast start" for the EDG. In order to reduce stress and wear on diesel engines, the manufacturer recommends a modified start in which the starting speed of the EDG is limited, warmup is limited to a lower speed, and the EDG is gradually accelerated to synchronous speed prior to loading. Use of the modified start method requires the diesel governor system to be capable of engine idling and gradual acceleration to synchronous speed. When the modified start is not used footnote (***) requires that the time, voltage, and frequency tolerances of SR 4.8.1.1.2e) (10 second start) be met.

The deletion of the first sentence of footnote (***) and revision of the second sentence will not the alter the original intent of the footnote and will remove the undesirable tie between action statement b. and c. of TS 3.8.1.1 and SR 4.8.1.1.2a.6). Literal compliance

with the wording of first sentence of footnote (***) requires loading and operating the only operable EDG for at least 60 minutes connected to the off-site power grid when an EDG unit is declared inoperable and entry into either action statement b. or c. of TS 3.8.1.1 (as applicable) is required. This interpretation of footnote (***) was reinforced by the NRC in Inspection Report 05000443/2003003 dated July 29, 2003. A non-cited violation (NCV 05000443/2003003-03) was issued for failure to perform a loaded run of the only operable EDG unit within 24 hours of identification of a potential common mode failure of an EDG unit. When the only operable EDG unit is operating and paralleled to the off-site power system, it may be vulnerable to offsite grid disturbances. This action is also not consistent with guidance previously provided by the NRC in Information Notice 84-96 (including Supplement 1), "Operation of Emergency Diesel Generators."

The benefit gained by having a tie between action statement b. and c. of TS 3.8.1.1 and SR 4.8.1.1.2a.6) for human factoring purposes is clearly outweighed by the potential adverse consequences of paralleling the only operable EDG unit to the off-site grid. The deletion of the first sentence and the revision of the second sentence of footnote (***) and the performance of only an unloaded run of the only operable EDG unit is consistent with the methodology used in NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants."

The proposed change to the Bases section for SR 4.8.1.1.2a.5) has no effect on plant safety. This change is being made to maintain the Bases consistent with the proposed change to footnote (***) of SR 4.8.1.1.2a.5) and is provided for information only.

Conclusion:

In conclusion, based on the considerations discussed above 1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, 2) such activities will be conducted in compliance with the Commission's regulations, and 3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

SECTION II

MARKUP OF PROPOSED CHANGES

Refer to the attached markup of the proposed changes to the Technical Specifications and Bases. The attached markup reflects the currently issued revision of the Technical Specifications and Bases listed below. Pending Technical Specifications or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed markup.

The following Technical Specification change is included in the attached markup:

Technical Specification	Title	Page
4.8.1.1.2a.5)	A.C. Sources Surveillance Requirements	3/4 8-3
Bases Section	**Title**	**Page**
SR 4.8.1.1.2a.5)	A.C. Sources Surveillance Requirements	B 3/4 8-9

ELECTRICAL POWER SYSTEMS

A.C. SOURCES

OPERATING

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the Onsite Class 1E Distribution System shall be:

a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and

b. Demonstrated OPERABLE at least once per 18 months by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.*

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE.**

a. At least once per 31 days on a STAGGERED TEST BASIS by:

1) Verifying the fuel level in the day fuel tank;

2) Verifying the fuel level in the fuel storage tank;

3) Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day tank;

4) Verifying the lubricating oil inventory in storage;

5) Verifying the diesel starts from standby conditions and attains a steady-state generator voltage and frequency of 4160 ± 420 volts and 60 ± 1.2 Hz.***

* This surveillance requirement shall not be performed in Mode 1 or 2.

** All planned starts for the purpose of these surveillances may be preceded by an engine prelube period.

*** Performance of Specification 4.8.1.1.2a.6) must immediately follow this surveillance. Additionally, a modified start involving idling and gradual acceleration to synchronous speed may be used for this surveillance. When modified start procedures are not used, the time, voltage, and frequency tolerances of Specification 4.8.1.1.2e must be met.

3/4.8.1 AC SOURCES (Continued)

SURVEILLANCE REQUIREMENTS (SR) (continued)

SR 4.8.1.1.2a.1) provides verification that the level of fuel oil in the day tank is at or above the level at which fuel oil is automatically added. The level is expressed as an equivalent volume in gallons, and is selected to ensure adequate fuel oil for a minimum of 1 hour of EDG operation at full load plus 10%. The 31-day frequency is adequate to assure that a sufficient supply of fuel oil is available, since low level alarms are provided and facility operators would be aware of any large uses of fuel oil during this period.

SR 4.8.1.1.2a.2) provides verification that there is an adequate inventory of fuel oil in the storage tanks to support each EDG's operation for 7 days. The 7-day period is sufficient time to place the unit in a safe shutdown condition and to bring in replenishment fuel from an offsite location. The 31-day frequency is adequate to ensure that a sufficient supply of fuel oil is available, since low level alarms are provided and unit operators would be aware of any large uses of fuel oil during this period.

SR 4.8.1.1.2a.3) demonstrates that each required fuel oil transfer pump operates and transfers fuel oil from its associated storage tank to its associated day tank. This is required to support continuous operation of standby power sources. This Surveillance provides assurance that the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the controls and control systems for automatic fuel transfer systems are OPERABLE. The 31-day frequency is appropriate since proper operation of fuel transfer systems is an inherent part of EDG OPERABILITY.

SR 4.8.1.1.2a.4) ensures that sufficient lube oil inventory is available to support at least 7 days of operation for each EDG. The 275 gal minimum requirement is based on the EDG manufacturer consumption values for the run time of the EDG. Implicit in this SR is the requirement to verify the capability to transfer the lube oil from its storage location to the EDG, when the EDG lube oil sump does not hold adequate inventory for 7 days of operation without the level reaching the manufacturer recommended minimum level. A 31-day frequency is adequate to ensure that a sufficient lube oil supply is onsite, since EDG starts and run time are closely monitored by the unit staff.

SR 4.8.1.1.2a.5) ensures that the EDG is capable of starting from standby conditions and attaining rated voltage and frequency. The SR is modified by footnote *** which requires the EDG to be gradually loaded per SR 4.8.1.1.2a.6) immediately following the performance of this SR. In addition, footnote *** allows a modified start procedure to be used in lieu of the 10-12 seconds "fast start" for the EDG. In order to reduce stress and wear on diesel engines, the manufacturer recommends a modified start in which the starting speed of the EDG is limited, warmup is limited to this lower speed, and the EDG is gradually accelerated to synchronous speed prior to loading. Use of the modified start method requires the diesel governor system to be capable of engine idling and gradual acceleration to synchronous speed. When the modified start is not used footnote *** requires that the time, voltage, and frequency tolerances of SR 4.8.1.1.2e) (10 second start) be met. The 31-day frequency for SR 4.8.1.1.2a.5) is consistent with Regulatory Guide 1.9 (Ref. 3), though Seabrook Station is not committed to Regulatory Guide 1.9.

SR 4.8.1.1.2a.6) verifies that the EDG is capable of synchronizing with the offsite electrical system and accepting loads greater than or equal to the equivalent of the maximum expected accident loads. A minimum run time of 60 minutes is required to stabilize engine temperatures, while minimizing the time that the EDG is connected to the offsite source.

To minimize mechanical stress and wear on the diesel engine SR 4.8.1.1.2a.6) is modified by footnote **** that allows EDG loading per the manufacturers recommendations, including a

SECTION III

RETYPE OF PROPOSED CHANGES

Refer to the attached retype of the proposed changes to the Technical Specifications and Bases. The attached retype reflects the currently issued version of the Technical Specifications and Bases. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the Onsite Class 1E Distribution System shall be:

a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and

b. Demonstrated OPERABLE at least once per 18 months by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.*

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE.**

a. At least once per 31 days on a STAGGERED TEST BASIS by:

1) Verifying the fuel level in the day fuel tank;

2) Verifying the fuel level in the fuel storage tank;

3) Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day tank;

4) Verifying the lubricating oil inventory in storage;

5) Verifying the diesel starts from standby conditions and attains a steady-state generator voltage and frequency of 4160 ± 420 volts and 60 ± 1.2 Hz.***

* This surveillance requirement shall not be performed in Mode 1 or 2.

** All planned starts for the purpose of these surveillances may be preceded by an engine prelube period.

*** A modified start involving idling and gradual acceleration to synchronous speed may be used for this surveillance. When modified start procedures are not used, the time, voltage, and frequency tolerances of Specification 4.8.1.1.2e must be met.

3/4.8.1 AC SOURCES (Continued)

SURVEILLANCE REQUIREMENTS (SR) (continued)

SR 4.8.1.1.2a.1) provides verification that the level of fuel oil in the day tank is at or above the level at which fuel oil is automatically added. The level is expressed as an equivalent volume in gallons, and is selected to ensure adequate fuel oil for a minimum of 1 hour of EDG operation at full load plus 10%. The 31-day frequency is adequate to assure that a sufficient supply of fuel oil is available, since low level alarms are provided and facility operators would be aware of any large uses of fuel oil during this period.

SR 4.8.1.1.2a.2) provides verification that there is an adequate inventory of fuel oil in the storage tanks to support each EDG's operation for 7 days. The 7-day period is sufficient time to place the unit in a safe shutdown condition and to bring in replenishment fuel from an offsite location. The 31-day frequency is adequate to ensure that a sufficient supply of fuel oil is available, since low level alarms are provided and unit operators would be aware of any large uses of fuel oil during this period.

SR 4.8.1.1.2a.3) demonstrates that each required fuel oil transfer pump operates and transfers fuel oil from its associated storage tank to its associated day tank. This is required to support continuous operation of standby power sources. This Surveillance provides assurance that the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the controls and control systems for automatic fuel transfer systems are OPERABLE. The 31-day frequency is appropriate since proper operation of fuel transfer systems is an inherent part of EDG OPERABILITY.

SR 4.8.1.1.2a.4) ensures that sufficient lube oil inventory is available to support at least 7 days of operation for each EDG. The 275 gal minimum requirement is based on the EDG manufacturer consumption values for the run time of the EDG. Implicit in this SR is the requirement to verify the capability to transfer the lube oil from its storage location to the EDG, when the EDG lube oil sump does not hold adequate inventory for 7 days of operation without the level reaching the manufacturer recommended minimum level. A 31-day frequency is adequate to ensure that a sufficient lube oil supply is onsite, since EDG starts and run time are closely monitored by the unit staff.

SR 4.8.1.1.2a.5) ensures that the EDG is capable of starting from standby conditions and attaining rated voltage and frequency. Footnote *** allows a modified start procedure to be used in lieu of the 10-12 seconds "fast start" for the EDG. In order to reduce stress and wear on diesel engines, the manufacturer recommends a modified start in which the starting speed of the EDG is limited, warmup is limited to this lower speed, and the EDG is gradually accelerated to synchronous speed prior to loading. Use of the modified start method requires the diesel governor system to be capable of engine idling and gradual acceleration to synchronous speed. When the modified start is not used footnote *** requires that the time, voltage, and frequency tolerances of SR 4.8.1.1.2e) (10 second start) be met. The 31-day frequency for SR 4.8.1.1.2a.5) is consistent with Regulatory Guide 1.9 (Ref. 3), though Seabrook Station is not committed to Regulatory Guide 1.9.

SR 4.8.1.1.2a.6) verifies that the EDG is capable of synchronizing with the offsite electrical system and accepting loads greater than or equal to the equivalent of the maximum expected accident loads. A minimum run time of 60 minutes is required to stabilize engine temperatures, while minimizing the time that the EDG is connected to the offsite source.

To minimize mechanical stress and wear on the diesel engine SR 4.8.1.1.2a.6) is modified by footnote **** that allows EDG loading per the manufacturers recommendations, including a

SECTION IV

DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGES

IV. DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGES

FPL Energy Seabrook, LLC (FPLE Seabrook) proposes to revise to revise footnote (***) of Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2a.5) and associated Bases. This surveillance requirement ensures that the Emergency Diesel Generator (EDG) is capable of starting from standby conditions and attaining rated voltage and frequency. SR 4.8.1.1.2a.5) is modified by footnote (***) which requires the EDG to be gradually loaded per SR 4.8.1.1.2a.6) immediately following the performance of this SR. In addition, footnote (***) allows a modified start procedure to be used in lieu of the 10-12 seconds "fast start" for the EDG.

The purpose of first sentence of footnote (***) was to provide a link between SR 4.8.1.1.2a.5) and SR 4.8.1.1.2a.6) for human factoring purposes. However, an unintended effect of the addition of the first sentence of footnote (***) was that it also created a link between action statement b. and c. of TS 3.8.1.1 and the loaded surveillance testing requirements of SR 4.8.1.1.2a.6). Retaining the link between action statements b. and c. of TS 3.8.1.1 and SR 4.8.1.1.2a.6) is undesirable and would require loading and paralleling the only operable EDG unit to the off-site grid. The proposed change to the Bases is provided for information only.

1. *The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.*

   FPL Energy Seabrook, LLC (FPLE Seabrook) proposes to revise footnote (***) of Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2a.5) to remove the link created between actions b. and c. of TS 3.8.1.1 and the loaded surveillance testing requirements of SR 4.8.1.1.2a.6). This revision to footnote (***) is a change to the Technical Specifications that does not modify the physical design or operation of the plant and will not create a possibility of an accident. Strict compliance with the footnote requires paralleling the only operable EDG unit with the off-site grid upon entry into action statement b. or c. of TS 3.8.1.1. Operation of the only operable EDG unit in this manner may increase its vulnerability for failure if power from the off-site grid is disturbed or lost. EDG unit availability for subsequent emergency demands may also be adversely affected.

   The proposed change will eliminate the undesirable link that presently exists between action statement b. and c. of TS 3.8.1.1 and SR 4.8.1.1.2a.6) but will maintain the primary purpose of the SR, which is to ensure that the EDG unit is capable of starting from standby conditions and attaining rated voltage and frequency. Additionally, the proposed change is consistent with the methodology used in NRC NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants." Therefore, the proposed change does not involve a

significant increase the probability or consequences of an accident previously evaluated.

2. *The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.*

   The proposed change does not affect any plant structures, systems, or components. The operation of plant systems and equipment will not be affected by this proposed change. The proposed change to footnote (***) does not have the capability to initiate accidents. The proposed change will eliminate the undesirable link that presently exists between action statement b. and c. of TS 3.8.1.1 and SR 4.8.1.1.2a.6). However, the proposed change will maintain the primary purpose of the SR and supporting footnote, which is to ensure that the EDG unit is capable of starting from standby conditions and attaining rated voltage and frequency. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *The proposed changes do not involve a significant reduction in the margin of safety.*

   The proposed changes do not involve a change in the operational limits or physical design of the plant. The proposed changes do not change the function or operation of plant equipment or affect the response of that equipment if it is called on to operate. The performance capability of the EDG units will not be affected. The proposed change will maintain the primary purpose of the SR and supporting footnote, which is to ensure that the EDG unit is capable of starting from standby conditions and attaining rated voltage and frequency. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above evaluation, FPLE Seabrook concludes that the proposed change does not constitute a significant hazard.

SECTIONS V AND VI

PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS

AND

ENVIRONMENTAL IMPACT ASSESSMENT

V. PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS

FPLE Seabrook requests NRC review of License Amendment Request 03-04, and issuance of a license amendment by January 30, 2005, having immediate effectiveness and implementation within 60 days.

VI. ENVIRONMENTAL IMPACT ASSESSMENT

FPLE Seabrook has reviewed the proposed license amendment against the criteria of 10 CFR 51.22 for environmental considerations. 10CFR51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment of an operating license for a facility requires no environmental assessment if the operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; or (3) result in a significant increase in individual or cumulative occupational radiation exposure.

FPLE Seabrook has reviewed this proposed license amendment request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment. FPLE Seabrook proposes to revise footnote (***) of Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2a.5).

This change meets the eligibility criteria for categorical exclusion set forth in 10CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in the Section IV of this LAR, the proposed amendment does not involve a significant hazards consideration.

2. The proposed amendment does not result in a significant change in the types or increase in the amounts of any effluents that may be released offsite. The change does not introduce any new effluents or increase the quantities of existing effluents. As such, the change cannot significantly affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in a significant increase in individual or cumulative occupational radiation exposure. The proposed change does not result in any physical plant changes or new surveillances that would increase the cumulative occupational radiation exposure. Therefore, the proposed amendment has no significant affect on either individual or cumulative occupational radiation exposure.