



FPL Energy
Seabrook Station

FPL Energy Seabrook Station
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DEC 16 2004

Docket No. 50-443

SBK-L-04127

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Reference: FPL Energy Seabrook Letter SBK-L-04097, Seabrook Station License
Amendment Request 04-08, "Changes to Technical Specification 3.3.3.6,
Accident Monitoring Instrumentation," October 22, 2004

Seabrook Station
"Response to Request for Additional Information
Regarding License Amendment Request 04-08"

Enclosed is the FPL Energy Seabrook, LLC (FPL Energy Seabrook) response to request for
additional information associated with License Amendment Request (LAR) 04-08 received on
November 17, 2004.

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

Very truly yours,

FPL Energy Seabrook, LLC

A handwritten signature in black ink, appearing to read 'Mark E. Warner', written over a horizontal line.

Mark E. Warner
Site Vice President

A001

cc: S. J. Collins, NRC Region I Administrator
V. Nerses, NRC Project Manager, Project Directorate I-2
G. T. Dentel, NRC Senior Resident Inspector

Mr. Bruce Cheney, Director
New Hampshire Office of Emergency Management
State Office Park South
107 Pleasant Street
Concord, NH 03301

OATH AND AFFIRMATION

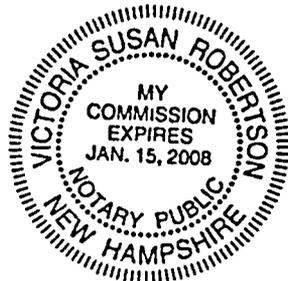
I, Mark E. Warner, Site Vice President of FPL Energy Seabrook, LLC, hereby affirm that the information and statements contained within this response to the request for additional information to License Amendment Request 04-08 are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

Sworn and Subscribed
before me this

16th day of December, 2004

Victoria Susan Robertson
Notary Public

Mark E. Warner
Mark E. Warner
Site Vice President



Enclosure 1 to Letter No. SBK-L-04127
Response to Request for Additional Information
Regarding License Amendment Request 04-08

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RAI

In LAR 04-08, FPL Energy Seabrook states that the revised actions proposed in the amendment request are consistent with the conditions and completion times contained in NUREG 1431, Rev. 3, "Improved Standard Technical Specifications, Westinghouse Plants," (ISTS).

Please provide a comparison of the assumptions and similarities of the Seabrook Station TS 3.3.3.6 to the ISTS equivalent section 3.3.3. This comparison should include a comparison of LCOs, operating mode applicability, exceptions to other LCOs, and surveillance requirements.

FPL Energy Seabrook Response

Attached to this response are Seabrook Station TS 3.3.3.6, Accident Monitoring Instrumentation, and ISTS 3.3.3, Post Accident Monitoring (PAM) Instrumentation.

Seabrook Station TS 3.3.3.6, Accident Monitoring Instrumentation, and ISTS 3.3.3, PAM Instrumentation, both ensure the operability of instrumentation that monitors Type A and Category 1 variables as defined in Regulatory Guide (RG) 1.97. The requirements for post-accident monitoring (PAM) instrumentation contained in proposed Seabrook TS 3.3.3.6 are similar to the requirements in ISTS 3.3.3 as discussed in the following comparison.

Limiting Condition for Operation (LCO)

The LCOs in ISTS 3.3.3 and Seabrook TS 3.3.3.6 require the operability of PAM instrumentation. ISTS Table 3.3.3-1, Post Accident Monitoring Instrumentation, notes that the table shall be amended as necessary to list all Regulatory Guide 1.97, Type A instruments and all Category 1, non-Type A instruments in accordance with the unit's RG 1.97 Safety Evaluation Report. Seabrook TS Table 3.3-10, Accident Monitoring Instrumentation, contains the Seabrook-specific RG 1.97 Type A and Category 1, non-Type A accident monitoring instruments.

Operating Mode Applicability

The ISTS and the Seabrook TS contain the same operating mode applicability, MODES 1, 2, and 3.

Exceptions to Other LCOs

The Seabrook TS retains an exception to TS 3.0.4, which existed prior to this proposed change. This exception allows entry into modes 1, 2, and 3 with inoperable PAM instrumentation while the associated action requires a shutdown after a specified period

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of time. Similarly, the ISTS permit entry into Modes 1, 2, and 3 under the same conditions, in accordance with LCO 3.0.4.b, after performing a risk assessment that addresses the inoperable PAM instrumentation.

Surveillance Requirements

The ISTS and the Seabrook TS require a Channel Check of each PAM instrument channel every 31 days and a Channel Calibration of each channel every 18 months. The ISTS excludes the neutron detectors from the Channel Calibration; however, the Seabrook TS does not contain such an exclusion.

INSTRUMENTATION

MONITORING INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.6 The accident monitoring instrumentation channels shown in Table 3.3-10 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With the number of OPERABLE accident monitoring instrumentation channels less than the Total Number of Channels shown in Table 3.3-10, restore the inoperable channel(s) to OPERABLE status within 7 days, or be in at least HOT STANDBY within the next 6 hours and in at least HOT SHUTDOWN within the following 6 hours. The provisions of Specification 3.0.4 are not applicable.
- b. With the number of OPERABLE accident monitoring instrumentation channels except the containment POST-LOCA high range area monitor, less than the Minimum Channels OPERABLE requirements of Table 3.3-10, restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in at least HOT SHUTDOWN within the following 6 hours. The provisions of Specification 3.0.4 are not applicable.
- c. With the number of OPERABLE channels for the containment Post-LOCA high range area monitor less than required by the Minimum Channels OPERABLE requirements, initiate an alternate method of monitoring the appropriate parameter(s), within 72 hours, and either restore the inoperable channel(s) to OPERABLE status within 7 days or prepare and submit a Special Report to the Commission, pursuant to Specification 6.8.2, within 14 days that provides actions taken, cause of the inoperability, and the plans and schedule for restoring the channels to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.3.3.6 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE:

- a. Every 31 days by performance of a CHANNEL CHECK, and
- b. Every 18 months by performance of a CHANNEL CALIBRATION.

TABLE 3.3-10

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>
1. Containment Pressure		
a. Normal Range	2	1
b. Extended Range	2	1
2. Reactor Coolant Outlet Temperature - T _{HOT} (Wide Range)	4	2
3. Reactor Coolant Inlet Temperature - T _{COLD} (Wide Range)	4	2
4. Reactor Coolant Pressure - Wide Range	2	1
5. Pressurizer Water Level	2	1
6. Steam Generator Pressure	2/steam generator	1/steam generator
7. Steam Generator Water Level - Narrow Range	1/steam generator	1/steam generator
8. Steam Generator Water Level - Wide Range	1/steam generator	1/steam generator
9. Refueling Water Storage Tank Water Level	2	1
10. Reactor Coolant System Subcooling Margin Monitor	2	1
11. Containment Building Water Level	2	1
12. Core Exit Thermocouples	4/core quadrant	2/core quadrant
13. Containment Post-LOCA Area Monitor	2	1

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TABLE 3.3-10 (Continued)

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>
14. Intermediate Range Neutron Flux	2	1
15. Intermediate Range Neutron Flux Rate	2	1
16. Containment Isolation Valve Position*	2/Penetration	1/Penetration
17. Containment Enclosure Negative Pressure	2	1
18. Condensate Storage Tank Water Level**	2	1
19. Reactor Vessel Level Indication System	2	1
20. Containment Hydrogen Concentration	2	1

*Applies to penetrations with 2 active valves in series. These valves are moved to the closed position by automatic signals.

**Calculated on basis of pressure sensed at suction to the Emergency Feedwater Pumps.

3.3 INSTRUMENTATION

3.3.3 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3 The PAM instrumentation for each Function in Table 3.3.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

NOTE

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.7.	Immediately
C. One or more Functions with two required channels inoperable.	C.1 Restore one channel to OPERABLE status.	7 days
D. Required Action and associated Completion Time of Condition C not met.	D.1 Enter the Condition referenced in Table 3.3.3-1 for the channel.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. As required by Required Action D.1 and referenced in Table 3.3.3-1.	E.1 Be in MODE 3.	6 hours
	<u>AND</u> E.2 Be in MODE 4.	12 hours
F. As required by Required Action D.1 and referenced in Table 3.3.3-1.	F.1 Initiate action in accordance with Specification 5.6.7.	Immediately

SURVEILLANCE REQUIREMENTS

~~NOTE~~

SR 3.3.3.1 and SR 3.3.3.2 apply to each PAM instrumentation Function in Table 3.3.3-1.

SURVEILLANCE		FREQUENCY
SR 3.3.3.1	Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.3.2	NOTE Neutron detectors are excluded from CHANNEL CALIBRATION. Perform CHANNEL CALIBRATION.	[18] months

Table 3.3.3-1 (page 1 of 1)
Post Accident Monitoring Instrumentation

FUNCTION	REQUIRED CHANNELS	CONDITION REFERENCED FROM REQUIRED ACTION D.1
1. Power Range Neutron Flux	2	E
2. Source Range Neutron Flux	2	E
3. Reactor Coolant System (RCS) Hot Leg Temperature	2 per loop	E
4. RCS Cold Leg Temperature	2 per loop	E
5. RCS Pressure (Wide Range)	2	E
6. Reactor Vessel Water Level	2	F
7. Containment Sump Water Level (Wide Range)	2	E
8. Containment Pressure (Wide Range)	2	E
9. Penetration Flow Path Containment Isolation Valve Position	2 per penetration flow path ^{(a)(b)}	E
10. Containment Area Radiation (High Range)	2	F
11. Pressurizer Level	2	E
12. Steam Generator Water Level (Wide Range)	2 per steam generator	E
13. Condensate Storage Tank Level	2	E
14. Core Exit Temperature - Quadrant [1]	2 ^(c)	E
15. Core Exit Temperature - Quadrant [2]	2 ^(c)	E
16. Core Exit Temperature - Quadrant [3]	2 ^(c)	E
17. Core Exit Temperature - Quadrant [4]	2 ^(c)	E
18. Auxiliary Feedwater Flow	2	E

(a) Not required for isolation valves whose associated penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.

(b) Only one position indication channel is required for penetration flow paths with only one installed control room indication channel.

(c) A channel consists of two core exit thermocouples (CETs).

REVIEWER'S NOTE

Table 3.3.3-1 shall be amended for each unit as necessary to list:

- All Regulatory Guide 1.97, Type A instruments and
- All Regulatory Guide 1.97, Category I, non-Type A instruments in accordance with the unit's Regulatory Guide 1.97, Safety Evaluation Report.