



FPL Energy
Seabrook Station

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MAR 28 2005

SBK-L-05055
Docket No. 50-443

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

Seabrook Station
License Amendment Request 05-03
“Exemption from the End of Life Moderator Temperature Coefficient Measurement”

FPL Energy Seabrook, LLC (FPL Energy Seabrook) has enclosed herein License Amendment Request (LAR) 05-03. License Amendment Request 05-03 is submitted pursuant to the requirements of 10 CFR 50.90 and 10 CFR 50.4.

This LAR, based on WCAP-13749-P-A, *Safety Evaluation Supporting the Conditional Exemption of the Most Negative EOL Moderator Temperature Coefficient Measurement*, modifies the end of life moderator temperature coefficient (MTC) surveillance requirement by allowing an exemption to the surveillance if certain conditions are met. This conditional exemption from the surveillance requirement will be determined on a cycle-specific basis by considering the predicted margin to the MTC limit and other core parameters such as beginning of life MTC measurements and critical boron concentration. This conditional exemption from the MTC measurement is sought to improve plant availability and minimize disruptions to normal plant operations.

As discussed in the enclosed LAR Section IV, the proposed change does not involve a significant hazard 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). FPL Energy Seabrook has determined that LAR 05-03 meets the criteria of 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement. The Station Operation Review Committee and the Company Nuclear Review Board have reviewed this LAR.

FPL Energy Seabrook requests NRC Staff review and approval of LAR 05-03 with issuance of a license amendment by March 31, 2006, and implementation of the amendment within 90 days.

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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.

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

Mark E. Warner
Site Vice President

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



FPL Energy
Seabrook Station

SEABROOK STATION UNIT 1

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

License Amendment Request 05-03
“Exemption from the End of Life Moderator Temperature Coefficient Measurement”

The following information is enclosed in support of this License Amendment Request:

- Section I - Introduction and Safety Assessment for Proposed Change
- Section II - Markup of Proposed Change
- Section III - Retype of Proposed Change
- Section IV - Determination of Significant Hazards for Proposed Change
- 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 hereby 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.

Sworn and Subscribed
before me this

28 day of March, 2005

Michael D. O'Keefe _____
Notary Public Mark E. Warner
Site Vice President



I. INTRODUCTION AND SAFETY ASSESSMENT FOR PROPOSED CHANGE

Introduction

The proposed changes revise the near-end of life (EOL) moderator temperature coefficient (MTC) surveillance requirement (SR) 4.1.1.3.b by placing a set of conditions on core operation, which if met, would allow exemption from the required MTC measurement. The conditional exemption will be determined on a cycle-specific basis by considering the margin predicted to the surveillance requirement MTC limit and the performance of other core parameters, such as beginning of life (BOL) MTC measurements and critical boron concentration as a function of cycle length. The conditional exemption will improve plant availability and minimize disruptions to normal plant operation with no compromise in plant safety. This LAR requires no changes to the TS bases.

Proposed Changes

1. Technical Specification (TS) surveillance requirement 4.1.1.3 b is revised to suspend the MTC measurement if the model benchmark criteria and Revised Prediction specified in the Core Operating Limits Report (COLR) are satisfied.
2. The list of references for the COLR in TS 6.8.1.6.b. is revised to include WCAP-13749-P-A, "Safety Evaluation Supporting the Conditional Exemption of the Most Negative EOL Moderator Temperature Coefficient Measurement."

Background

One of the controlling parameters for power and reactivity changes is the MTC. The requirements of TS 3.1.1.3 ensure that the MTC remains within the bounds used in the applicable Updated Final Safety Analysis Report (UFSAR) Chapter 15 accident analysis. This, in turn, ensures inherently stable power operations during normal operation and accident conditions.

TS 3.1.1.3, Moderator Temperature Coefficient, places limits on the MTC, based on the accident analysis assumptions for the moderator density coefficient. A positive moderator density coefficient corresponds to a negative MTC. TS 3.1.1.3 requires that the MTC be less negative than the specified limit for the all rods withdrawn, EOL, rated thermal power condition. To demonstrate compliance with the limiting condition for operation (LCO) for the most negative MTC, surveillance requirement 4.1.1.3.b requires verification of the MTC after reaching an equilibrium boron concentration of 300 ppm. Because the hot full power (HFP) MTC value will gradually become more negative with additional core burn up and boron concentration reduction, a 300 ppm MTC surveillance value should be less negative than the EOL LCO limit. To account for this effect, the 300 ppm MTC surveillance value is sufficiently less negative than the EOL LCO limit value to provide assurance that the LCO will be met as long as the 300 ppm MTC surveillance criterion is met.

Currently, the TS requires measurements of MTC at BOL to verify the most positive MTC limit and near EOL to verify the most negative MTC limit. At BOL, the measurement of the isothermal temperature coefficient is relatively simple to perform since it is done at hot zero power isothermal conditions and is not complicated by changes in the enthalpy rise or the presence of xenon. On the other hand, the measurement made near EOL is performed at or near HFP conditions. MTC measurements at HFP are more difficult to perform due to small variations in soluble boron concentration, changes in xenon concentration and distribution, changes in fuel temperature, and changes in enthalpy rise created by small changes in the core average power during the measurement. Changes in each of these parameters must be accurately accounted for when reducing the measurement data or additional measurement uncertainties will be introduced. Even though these additional uncertainties may be small, the total reactivity change associated with the swing in moderator temperature induced to perform the surveillance test is also relatively small. The resulting MTC measurement uncertainty created by even a small change in power level may then become significant and, if improperly accounted for, can yield misleading measurement results.

Following the implementation of the Seabrook station power up-rate, the MTC measurement is expected to require several hours at reduced power to perform the test, introducing a perturbation to normal reactor operation. An alternate method is proposed to improve availability and minimize perturbations on normal reactor operation. The MTC measurement is replaced by a design calculation of the core MTC if predefined requirements are met. The proposed change modifies the EOL MTC surveillance requirement by placing a set of conditions on core operations. If these conditions are met, i.e., the specified revised prediction of the MTC and limits for several core parameters measured during the cycle are within specified bounds, performing the surveillance measurement is not required.

Safety Assessment of Proposed Changes

The conditional exemption from the HFP near-EOL 300 ppm MTC measurement does not affect the safety analyses. The safety analyses assumption of a constant moderator density coefficient and the actual value assumed in the analyses will not change. The TS bases and limiting values for the most negative MTC are not altered. In lieu of performing the MTC measurement, SR 4.1.1.3.b is changed so that a revised predicted MTC is compared to the EOL MTC surveillance limit. If the revised predicted MTC is less negative than the EOL MTC surveillance limit, an MTC measurement is not required. The proposed method for calculating the revised predicted MTC is consistent with the approved methodology contained in WCAP-13749-P-A.

The methodology associated with the proposed change was submitted to the NRC in Westinghouse topical report WCAP-13749-P in June 1993. In October 1996, the NRC determined the topical report to be acceptable for referencing in license applications to the extent specified and under the limitations stated in the Brookhaven technical evaluation report and the NRC staff's Safety Evaluation Report (NRC letter: Acceptance for Referencing of Licensing Topical Report WCAP-3749-P, "Safety Evaluation Supporting the Conditional Exemption of the Most Negative EOL [End-of-Life] Moderator Temperature Coefficient Measurement", R. Jones (NRC) to N. Liparulo

(Westinghouse); October 9, 1996.)

The NRC approved WCAP-13749-P with two conditions:

1. Only PHOENIX/ANC calculation methods are used for the individual plant analyses relevant to determinations for the EOL MTC plant methodology, and
2. The predictive correction is reexamined if changes in core fuel designs or continued MTC calculation/measurement data show significant effect on the predictive correction.

FPL Energy Seabrook will meet both of these requirements. The PHOENIX-P/ANC calculation methods are used for the Seabrook Station core designs. Prior to each use of the conditional elimination technique, FPL Energy Seabrook will confirm that core design changes and MTC calculation and measurement data do not show a significant effect on the predictive correction. The administrative controls for this confirmation will reside in the Seabrook Station procedure that controls the EOL MTC surveillance. If a significant effect is found, the use of the predictive correction will be re-examined.

FPL Energy Seabrook is using NRC-approved WCAP-13749-P-A as the basis for this license amendment request and will meet the technical requirements (use of PHOENIX/ANC calculation methods, reexamination of the predictive correction if changes in core fuel designs or continued MTC calculation/measurement data show significant effect on the predictive correction, and adherence to the benchmarking criteria) in the approved WCAP. The core performance benchmark criteria, which are confirmed from startup physics test results, from routine HFP boron concentration measurements, and from flux map surveillances performed during the cycle, must be met before the revised predicted MTC can be calculated in accordance with the prescribed algorithm contained in WCAP-13749-P-A.

Appendix A of WCAP-13749-P-A requires a new Specification 6.9.1.7 to be added:

6.9.1.7 The most negative MTC limits shall be provided to the NRC Regional Administrator with a copy to the Director of Nuclear Reactor Regulation, Attention: Chief, Core Performance Branch, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, at least 60 days prior to the date the limit would become effective unless otherwise approved by the Commission by letter. This report will include the data required for the determination of the Revised Prediction of the 300 ppm/ARO/RTP MTC per WCAP-13749, "Safety Evaluation Supporting the Conditional Elimination of the Most Negative EOL Moderator Temperature Coefficient Measurement", May, 1993 (Westinghouse Proprietary).

To reduce regulatory burden for both the NRC and the licensee, this LAR proposes not incorporating a "Most Negative Moderator Temperature Coefficient Limit Report" for two reasons. First, there is an inconsistency in WCAP-13749-P-A regarding the time frame of data collection and the submittal of the Most Negative Moderator Temperature Coefficient Limit Report to the NRC.

Additionally, the Most Negative Moderator Temperature Coefficient Limit Report serves no apparent technical purpose. Each of these reasons is discussed below.

Section 3.3.3 of WCAP-13749-P-A states:

“The Technical Specification Bases of the most negative MTC LCO and SR and the values of these limits are not altered. Instead, a revised prediction is compared to the SR MTC to determine if the SR limit is met. The revised prediction is simply the sum of the predicted HFP 300 ppm SR MTC plus an AFD correction factor plus a predictive correction term. This algorithm is summarized in Table 3-3.”

Table D-2 of WCAP-13749-P-A, “Algorithm for Determining the Revised Predicted Near-EOL 300 PPM MTC,” states:

"The Revised Predicted MTC = Predicted MTC + AFD Correction + Predicted Correction"

Where:

"Predicted MTC is calculated from Figure 1 [Predicted HFP ARO 300 ppm MTC Versus Cycle Burn up] at the burn up corresponding to the measurement of 300 ppm at RTP conditions..."

Table D-3 of WCAP-13749-P-A provides an “Example Worksheet for Calculating the Revised Predicted Near-EOL 300 PPM MTC.” Two of the required data inputs for this worksheet (B.1 and B.2) are used to calculate the AFD correction term in the algorithm:

B.1 Burn up of most recent HFP, equilibrium _____ MWD/MTU
conditions incore flux map

B.2 Measured HFP AFD at burn up (B.1) _____ % AFD

Reference incore flux map

I.D. _____ Date: _____

Since the Most Negative Moderator Temperature Coefficient Limit Report would have to be submitted at least 60 days before reaching 300 ppm boron concentration, it cannot include the 300 ppm data required for determining the Revised Prediction. To satisfy the Most Negative Moderator Temperature Coefficient Limit Report submittal requirement, the hot full power AFD data to be used for calculating the revised predicted MTC may have to be taken 60 to 90 days prior to reaching 300 ppm boron. WCAP-13749-P-A neither provides any method for adjusting the revised predicted

MTC to account for data collected 60 to 90 days prior to 300 ppm nor does it provide justification for using such early data in the calculation. Therefore, the requirement to submit the Most Negative Moderator Temperature Coefficient Limit Report and the requirements for the data that go into the report are inconsistent.

Additionally, the Most Negative Moderator Temperature Coefficient Limit Report serves no apparent technical requirement. The applicability restrictions contained in WCAP-13749-P-A, the algorithm, and the data required for determining the Revised Prediction will be included in Seabrook Station procedures governing the EOL MTC surveillance. There is no compelling reason that this particular surveillance should require notifying the NRC prior to performing the surveillance procedure. An exception to the requirement for a "Most Negative Moderator Temperature Coefficient Limit Report" was approved by the NRC for South Texas Units 1 and 2 in Amendment 144 to Facility Operating License No. NPF-76 and Amendment 132 to Facility Operating License No. NPF-80 on November 26, 2002.

The fourth paragraph in Section 3.2.1 of WCAP-13749-P-A states: "As part of determining the applicability of a conditional exemption from the near-EOC MTC measurement, a cycle-specific figure similar to Figure 3-1 will be provided as part of that cycle's Technical Specifications or Core Operating Limits Report (COLR). This approach..." However, the COLR changes contained in Appendix B, "COLR Revision," of WCAP-13749-P-A do not include a reference to Figure 3-1, Example of Predicted HFP ARO 300 ppm MTC Versus Cycle Burn Up. As a result, LAR 05-03 proposes including the appropriate cycle specific figure (predicted HFP ARO 300 ppm MTC versus cycle burn up) for Seabrook and the benchmark criteria in the surveillance procedure for the EOL MTC measurement. The COLR will contain the algorithm for the Revised Predicted MTC similar to the draft change to the COLR shown in attachment A.

SECTION II

MARKUP OF PROPOSED CHANGE

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

The following Technical Specifications are included in the attached markup:

<u>Technical Specification</u>	<u>Title</u>	<u>Page</u>
4.1.1.3	Moderator Temperature Coefficient	3/4 1-5
6.8.1.6.b	Core Operating Limits Report	6-18E

REACTIVITY CONTROL SYSTEMS

BORATION CONTROL

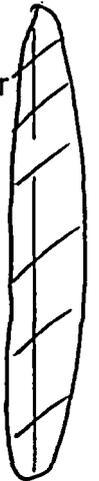
MODERATOR TEMPERATURE COEFFICIENT

SURVEILLANCE REQUIREMENTS

4.1.1.3 The MTC shall be determined to be within its limits during each fuel cycle as follows:

- a. The MTC shall be measured and compared to the BOL limit specified in the COLR, prior to initial operation above 5% of RATED THERMAL POWER, after each fuel loading; and
- b. The MTC shall be measured at any THERMAL POWER and compared to the 300 ppm surveillance limit specified in the COLR (all rods withdrawn, RATED THERMAL POWER condition) within 7 EFPD after reaching an equilibrium boron concentration of 300 ppm. In the event this comparison indicates the MTC is more negative than the 300 ppm surveillance limit specified in the COLR, the MTC shall be remeasured, and compared to the EOL MTC limit specified in the COLR, at least once per 14 EFPD during the remainder of the fuel cycle.

(*)



INSERT 1

INSERT 1

* Measurement of the MTC in accordance with Surveillance Requirement 4.1.1.3.b may be suspended provided that the benchmark criteria in WCAP-13749-P-A and the Revised Prediction specified in the COLR are satisfied.

ADMINISTRATIVE CONTROLS

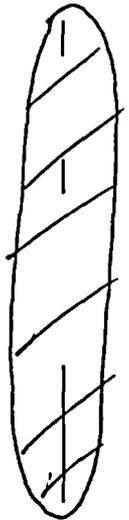
6.8.1.6.b. (Continued)

- 15. WCAP-9272-P-A, (Proprietary), "Westinghouse Reload Safety Evaluation Methodology", July, 1985.

Methodology for Specifications:

- 2.1 - Safety Limits
 - 3.1.1.1 - SHUTDOWN MARGIN for MODES 1,2,3, and 4
 - 3.1.1.2 - SHUTDOWN MARGIN for MODE 5
 - 3.1.1.3 - Moderator Temperature Coefficient
 - 3.1.2.7 - Isolation of Unborated Water Sources - Shutdown
 - 3.1.3.5 - Shutdown Rod Insertion Limit
 - 3.1.3.6 - Control Rod Insertion Limits
- 3.2.1 - AXIAL FLUX DIFFERENCE
- 3.2.2 - Heat Flux Hot Channel Factor
- 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor
- 3.2.5 - DNB Parameters
- 3.5.1.1 - Accumulators for MODES 1, 2 and 3
- 3.5.4 - Refueling Water Storage Tank for MODES 1, 2, 3, and 4
- 3.9.1 - Boron Concentration

INSERT 2



- 6.8.1.6.c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as SHUTDOWN MARGIN, and transient and accident analysis limits) of the safety analysis are met. The CORE OPERATING LIMITS REPORT for each reload cycle, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, to the NRC Document Control Desk with copies to the Regional Administrator and the Resident Inspector.

INSERT 2

16. WCAP-13749-P-A, (Proprietary) "Safety Evaluation Supporting the Conditional Exemption of the Most Negative Moderator Temperature Coefficient Measurement," March 1997

Methodology for Specification:

- 3.1.1.3 - Moderator Temperature Coefficient

SECTION III

RETYPE OF PROPOSED CHANGE

Refer to the attached retype of the proposed change to the Technical Specifications. The attached retype reflects the currently issued version of the Technical Specifications. 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.

The following Technical Specifications are included in the attached retype:

<u>Technical Specification</u>	<u>Title</u>	<u>Page</u>
4.1.1.3	Moderator Temperature Coefficient	3/4 1-5
6.8.1.6.b	Core Operating Limits Report	6-18E

REACTIVITY CONTROL SYSTEMS

BORATION CONTROL

MODERATOR TEMPERATURE COEFFICIENT

SURVEILLANCE REQUIREMENTS

4.1.1.3 The MTC shall be determined to be within its limits during each fuel cycle as follows:

- a. The MTC shall be measured and compared to the BOL limit specified in the COLR, prior to initial operation above 5% of RATED THERMAL POWER, after each fuel loading; and
- b. The MTC shall be measured at any THERMAL POWER and compared to the 300 ppm surveillance limit specified in the COLR (all rods withdrawn, RATED THERMAL POWER condition) within 7 EFPD after reaching an equilibrium boron concentration of 300 ppm*. In the event this comparison indicates the MTC is more negative than the 300 ppm surveillance limit specified in the COLR, the MTC shall be remeasured, and compared to the EOL MTC limit specified in the COLR, at least once per 14 EFPD during the remainder of the fuel cycle.

*Measurement of the MTC in accordance with Surveillance Requirement 4.1.1.3.b may be suspended provided that the benchmark criteria in WCAP-13749-P-A and the Revised Prediction specified in the COLR are satisfied.

ADMINISTRATIVE CONTROLS

6.8.1.6.b. (Continued)

15. WCAP-9272-P-A, (Proprietary), "Westinghouse Reload Safety Evaluation Methodology", July, 1985.

Methodology for Specifications:

- 2.1 - Safety Limits
- 3.1.1.1 - SHUTDOWN MARGIN for MODES 1,2,3, and 4
- 3.1.1.2 - SHUTDOWN MARGIN for MODE 5
- 3.1.1.3 - Moderator Temperature Coefficient
- 3.1.2.7 - Isolation of Unborated Water Sources - Shutdown
- 3.1.3.5 - Shutdown Rod Insertion Limit
- 3.1.3.6 - Control Rod Insertion Limits
- 3.2.1 - AXIAL FLUX DIFFERENCE
- 3.2.2 - Heat Flux Hot Channel Factor
- 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor
- 3.2.5 - DNB Parameters
- 3.5.1.1 - Accumulators for MODES 1, 2 and 3
- 3.5.4 - Refueling Water Storage Tank for MODES 1, 2, 3, and 4
- 3.9.1 - Boron Concentration

16. WCAP-13749-P-A, (Proprietary) "Safety Evaluation Supporting the Conditional Exemption of the Most Negative Moderator Temperature Coefficient Measurement", March, 1997.

Methodology for Specifications:

- 3.1.1.3 - Moderator Temperature Coefficient

- 6.8.1.6.c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as SHUTDOWN MARGIN, and transient and accident analysis limits) of the safety analysis are met. The CORE OPERATING LIMITS REPORT for each reload cycle, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, to the NRC Document Control Desk with copies to the Regional Administrator and the Resident Inspector.

IV. DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGE

In accordance with 10 CFR 50.92, FPL Energy Seabrook has concluded that the proposed changes do not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed changes do not involve a SHC is as follows:

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

The probability or consequences of accidents previously evaluated in the UFSAR are unaffected by this proposed change. There is no change to any equipment response or accident mitigation scenario, and this change results in no additional challenges to fission product barrier integrity. The proposed change does not alter the design, configuration, operation, or function of any plant system, structure, or component. Further, the existing limits on moderator temperature coefficient (MTC) established by the Technical Specifications (TS), based on assumptions in the safety analyses, remain unchanged and continue to be satisfied. As a result, the outcomes of previously evaluated accidents are unaffected. Therefore, the proposed change does not involve a significant increase in 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.*

No new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of the proposed change. The proposed change does not challenge the performance or integrity of any safety-related system. The proposed change neither installs or removes any plant equipment, nor alters the design, physical configuration, or mode of operation of any plant structure, system, or component. The MTC is a variable that must remain within prescribed limits, but it is not an accident initiator. No physical changes are being made to the plant, so no new accident causal mechanisms are being introduced. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

The margin of safety associated with the acceptance criteria of any accident is unchanged. The proposed change will have no affect on the availability, operability, or performance of the safety-related systems and components. The proposed change does not alter the design, configuration, operation, or function of any plant system, structure, or component. The ability of any operable structure, system, or component to perform its designated safety function is unaffected by this change. A change to a surveillance requirement is proposed based on an alternate method of confirming that the surveillance is met.

The Technical Specifications establish limits for the moderator temperature coefficient (MTC) based on assumptions in the accident analyses. Applying the conditional exemption from the MTC measurement changes the method of meeting the surveillance requirement; however, this change does not modify the TS values and ensures adherence to the current TS limits. The basis for the derivation of the MTC limits from the moderator density coefficient (MDC) assumed in the accident analysis is unchanged. Further, the safety analysis assumption of a constant MDC and its assumed value will not change. Therefore, the margin of safety as defined in the TS is not reduced and the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, FPL Energy Seabrook has determined that the proposed amendment does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any previously evaluated, or (3) involve a significant reduction in the margin of safety. Consequently, this proposed change does not involve a significant hazards consideration.

V. PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS

FPL Energy Seabrook requests NRC review of License Amendment Request 05-03, and issuance of a license amendment by March 31, 2006, having immediate effectiveness and implementation within 90 days.

VI. ENVIRONMENTAL IMPACT ASSESSMENT

FPL Energy Seabrook has reviewed the proposed license amendment against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluent that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, FPL Energy Seabrook concludes that the proposed changes meet the criteria delineated in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

ATTACHMENT A

Draft Change to the COLR

2.5 Moderator Temperature Coefficient: (Specification 3.1.1.3)

- 2.5.1 The Moderator Temperature Coefficient (MTC) shall be less positive than $+3.12 \times 10^{-5} \Delta K/K/^{\circ}F$ for Beginning of Cycle Life (BOL), All Rods Out (ARO), Hot Zero Thermal Power conditions.
- 2.5.2 MTC shall be less negative than $-5.0 \times 10^{-4} \Delta K/K/^{\circ}F$ for End of Cycle Life (EOL), ARO, Rated Thermal Power conditions.
- 2.5.3 The 300 ppm ARO, Rated Thermal Power MTC shall be less negative than $-4.1 \times 10^{-4} \Delta K/K/^{\circ}F$ (300 ppm Surveillance Limit).
- 2.5.4 *The Revised Predicted near-EOL 300 ppm MTC shall be calculated using the algorithm contained in WCAP 13749-P-A:*

Revised Predicted MTC = Predicted MTC + AFD Correction - 3 PCM/degree F

If the Revised Predicted MTC is less negative than the SR 4.1.1.3.b 300 ppm surveillance limit and all the benchmark data contained in the surveillance procedure are met, then an MTC measurement in accordance with SR 4.1.1.3.b is not required to be performed.