



**FPL Energy**  
**Seabrook Station**

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December 19, 2005

SBK-L-05225

Docket No. 50-443

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

Seabrook Station  
License Amendment Request 05-10  
Application for Technical Specification Improvement to  
Eliminate Requirements to Provide Monthly Operating Reports and  
Occupational Radiation Exposure Reports

FPL Energy Seabrook, LLC (FPL Energy Seabrook) has enclosed herein License Amendment Request (LAR) 05-10 "Application for Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports." License Amendment Request 05-10 is submitted pursuant to the requirements of 10 CFR 50.90 and 10 CFR 50.4.

The proposed amendment would delete the Technical Specifications (TS) requirements to submit monthly operating reports, the annual occupational radiation exposure report and an annual report documenting all challenges to the pressurizer power-operated relief valves (PORV) and safety valves. The change is consistent with NRC-approved Revision 1 to Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIIP).

As discussed in the enclosed LAR, 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 05-10 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.

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As part of this license amendment request, FPL Energy Seabrook commits to provide the NRC the operating data required by Generic Letter 97-02, "Revised Content of the Monthly Operating Report," each calendar quarter by use of an industry database (i.e., the Consolidated Data Entry (CDE) program, currently maintained by the Institute of Nuclear Power Operations).

FPL Energy Seabrook requests NRC Staff review and approval of LAR 05-10 with issuance of a license amendment by April 30, 2006 and implementation of the amendment within 90 days.

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.



Gene St. Pierre  
Site Vice President

Enclosures:

- Notarized Affidavit
- Licensee's Evaluation of the Proposed Change

Attachments:

- 1) Evaluation
- 2) Proposed Technical Specification Change (mark-up)
- 3) Proposed Technical Specification page (re-type)
- 4) List of Regulatory Commitments

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

Mr. Bruce G. Cheney, ENP, Director, Division of Emergency Services  
N. H. Department of Safety  
Division of Emergency Services, Communications, and Management  
Bureau of Emergency Management  
33 Hazen Drive  
Concord, NH 03305



**FPL Energy**  
**Seabrook Station**

**AFFIDAVIT**

**SEABROOK STATION UNIT 1**  
**Facility Operating License NPF-86**  
**Docket No. 50-443**  
**License Amendment Request 05-10**  
**“Application for Technical Specification Improvement to**  
**Eliminate Requirements to Provide Monthly Operating Reports and**  
**Occupational Radiation Exposure Reports”**

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

- **Attachment 1 - Licensee’s Evaluation of the Proposed Change**
- **Attachment 2 - Proposed Technical Specification Change (mark-up)**
- **Attachment 3 - Proposed Technical Specification Page (re-type)**
- **Attachment 4 - List of Regulatory Commitments**

**I, Gene St. Pierre, 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.**

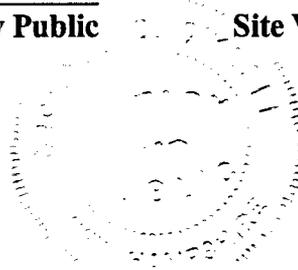
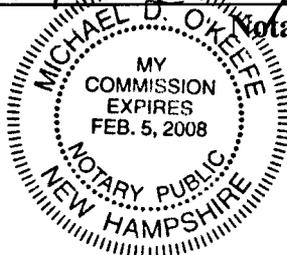
**Sworn and Subscribed**

before me this

19 day of December, 2005

Michael D. O’Keefe  
 Notary Public

Gene St. Pierre  
 Gene St. Pierre  
 Site Vice President



## **Attachment 1**

### **Licensee's Evaluation of the Proposed Change**

**Subject: License Amendment Request 05-10 "Application for Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports"**

1. DESCRIPTION
2. DESCRIPTION OF PROPOSED AMENDMENT
3. BACKGROUND
4. REGULATORY REQUIREMENTS AND GUIDANCE
5. TECHNICAL ANALYSIS
6. REGULATORY ANALYSIS
  - 6.1 Verification and Commitments
7. NO SIGNIFICANT HAZARDS CONSIDERATION
8. ENVIRONMENTAL EVALUATION
9. PRECEDENT
10. REFERENCES

## **1.0 DESCRIPTION**

This letter is a request to amend Facility Operating License NPF-86 Docket No. 50-443 for Seabrook Station Unit 1.

The proposed License amendment deletes the requirements in Technical Specification (TS) 6.8.1.2.a for an annual report on occupational radiation exposures, 6.8.1.2.c for an annual report documenting all challenges to the pressurizer power-operated relief valves (PORV) and safety valves and TS 6.8.1.5 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification improvement was announced in the Federal Register (Reference 1) on June 23, 2004 (69 FR 35067), as part of the consolidated line item improvement process (CLIP).

## **2.0 DESCRIPTION OF PROPOSED AMENDMENT**

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 6.8.1.2.a Occupational Radiation Exposure Report	Deleted
TS 6.8.1.2.c Challenges to the PORVs and Safety Valves	Deleted
TS 6.8.1.5 Monthly Operating Reports	Deleted

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, FPL Energy Seabrook is proposing to adopt a part of NRC-approved Revision 4 to TSTF-258, "Changes to Section 6.0 Administrative Controls" which addresses reporting requirements for Technical Specifications which include reporting challenges to PORVs and safety valves in the MOR. Specifically, TS 6.8.1.5 does not include this reporting requirement however TS 6.8.1.2.c includes a requirement to provide an annual report documenting all challenges to pressurizer power operated relief valves or pressurizer safety valves. The proposed change is consistent with the option described in the Notice of Availability published on June 23, 2004 (69 FR 35067) which states "The staff's acceptance of TSTF-258 and subsequent approval of plant-specific adoptions of TSTF-258 is based on the fact that the information on challenges to relief and safety valves is not used in the evaluation of the MOR data, and that the information needed by the NRC is adequately addressed by the reporting requirements in 10 CFR 50.73."

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, the removal of TS 6.8.1.2.a, TS 6.8.1.2.c and TS 6.8.1.5 resulted in various editorial and formatting changes such as the renumbering of TS sections and deletion of footnotes previously associated with TS 6.8.1.2.a. These changes reflect the renumbering of TS sections but do not revise technical or administrative requirements. In addition a footnote referring to single submittals for a multiple unit station is being deleted, as it is not applicable to Seabrook Station.

### **3.0 BACKGROUND**

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

### **4.0 REGULATORY REQUIREMENTS AND GUIDANCE**

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

### **5.0 TECHNICAL ANALYSIS**

FPL Energy Seabrook has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. FPL Energy Seabrook has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff is applicable to Seabrook Station and justifies this amendment for the incorporation of changes to the Seabrook Station Facility Operating License.

### **6.0 REGULATORY ANALYSIS**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

#### **6.1 Verification and Commitments**

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, FPL Energy Seabrook is making the following regulatory commitments:

1. FPL Energy Seabrook is making a regulatory commitment to provide to the NRC, using an industry database, the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating

Report,” by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry’s Consolidated Data Entry (CDE) program, currently maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e. data for all months will be provided using one or both systems (monthly operating reports and/or CDE).

2. Seabrook Station does not have different reactor types or both operating and shutdown reactors.

## **7.0 NO SIGNIFICANT HAZARDS CONSIDERATION**

FPL Energy Seabrook has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIP. FPL Energy Seabrook has concluded that the proposed determination presented in the notice is applicable to Seabrook Station and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

## **8.0 ENVIRONMENTAL EVALUATION**

FPL Energy Seabrook has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIP. FPL Energy Seabrook has concluded that the staff’s findings presented in that evaluation is applicable to Seabrook Station and the evaluation is hereby incorporated by reference for this application.

## **9.0 PRECEDENT**

This application is being made in accordance with the CLIP. FPL Energy Seabrook is not proposing variations or deviations from the TS changes described in TSTF-369 and the limited portion of TSTF-258 or the NRC staff’s model SE published on June 23, 2004 (69 FR 35067).

## **10.0 REFERENCES**

1. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).

## Attachment 2

### Proposed Technical Specification Change (mark-up)

Refer to the attached markup of the proposed change to the Technical Specifications. The attached markup reflects the currently issued version of the Technical Specifications. At the time of submittal, the Technical Specifications were revised through Amendment No. 104. 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>
INDEX	INDEX 6.0 Administrative Controls	xiv
TS 6.8.1.2.a	Occupational Radiation Exposure Report	6-12
TS 6.8.1.2.c	Challenges to the PORVs and Safety Valves	6-12
TS 6.8.1.5	Monthly Operating Reports	6-13

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~~Monthly Operating Reports ..... 6-13 |~~

CORE OPERATING LIMITS REPORT ..... 6-14 |

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## ADMINISTRATIVE CONTROLS

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The Startup Report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

## ANNUAL REPORTS

6.8.1.2 Annual Reports covering the activities of the station as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

- ~~a. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions\*\* (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions;~~

~~\*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.~~

~~\*\*This tabulation supplements the requirements of 10 CFR Part 20.2206.~~

ADMINISTRATIVE CONTROLS

Deleted 6.8.1.2 (Continued)

b. The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration (µCi/gm) and one other radioiodine isotope concentration (µCi/gm) as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

Deleted c. Documentation of all challenges to the pressurizer power-operated relief valves (PORVs) and safety valves.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.8.1.3 The annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.8.1.4 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous calendar year of operation shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

MONTHLY OPERATING REPORTS

6.8.1.5 Routine reports of operating statistics and shutdown experience shall be submitted on monthly basis to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attn: Document Control Desk, with a copy to the NRC Regional Administrator, no later than the 15th of each month following the calendar month covered by the report.

6.8.1.5 Deleted

### Attachment 3

#### Proposed Technical Specification Page (re-type)

Refer to the attached markup of the proposed change to the Technical Specifications. The attached markup reflects the currently issued version of the Technical Specifications. At the time of submittal, the Technical Specifications were revised through Amendment No. 104. Pending Technical Specifications or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed markup.

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## ADMINISTRATIVE CONTROLS

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The Startup Report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

### ANNUAL REPORTS

6.8.1.2 Annual Reports covering the activities of the station as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration ( $\mu\text{Ci/gm}$ ) and one other radio-iodine isotope concentration ( $\mu\text{Ci/gm}$ ) as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

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6.8.1.4 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous calendar year of operation shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

6.8.1.5 Deleted

## **Attachment 4**

### **List of Regulatory Commitments**

**The following list of regulatory commitments identifies those actions committed to by FPL Energy Seabrook in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.**

#### **COMMITMENT\***

1. FPL is making a regulatory commitment to provide to the NRC, using an industry database, the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and/or CDE.) Note: Seabrook Station does not have different reactor types or both operating and shutdown reactors

\* The above commitment is considered a repetitive commitment and will be implemented within 90 days of amendment issuance.