



FPL Energy
Seabrook Station

FPL Energy Seabrook Station
P.O. Box 300
Seabrook, NH 03874
(603) 773-7000

March 6, 2006

Docket No. 50-443

SBK-L-06044

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

References:

1. FPL Letter L2004-160, "NRC Bulletin 2004-01, Inspection of Alloy 82/182/600 Materials Used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized Water Reactors," July 27, 2004.
2. FPL Letter L2005-11, "Request for Additional Information, Inspection of Alloy 82/182/600 Materials Used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized Water Reactors," January 18, 2005.

Seabrook Station
Notification of Deviation from MRP-139 Inspection Requirement

FPL Energy Seabrook, LLC (FPL Energy Seabrook) is providing notification of a deviation from EPRI Materials Reliability Program (MRP) – 139 recommendations. In accordance with the guidance of NEI 03-08, Guideline for the Management of Materials Issues, Addendum D, Materials Guidelines Implementation Protocol, FPL Energy Seabrook has performed the required steps in the NEI Implementation Protocol to deviate from an Industry Materials Issue Program (IP).

In the referenced letters, FPL Energy Seabrook committed that it "will perform a BMV of the pressurizer welds at each RFO until further butt weld inspection guidance is issued by EPRI MRP, the ASME Code, or regulatory action. At that time FPL will follow the published guidance." With the issuance of MRP-139 in July of 2005, the industry has provided additional guidance. FPL Energy Seabrook is postponing the implementation of the recommended guidance issued in MRP-139 to perform UT inspections of the six (6) pressurizer butt welds from December 31, 2007 to the start of the Seabrook refueling outage on or about April 1, 2008.

A110


NEI 03-08, Addendum D, dictates how a utility may deviate from a “mandatory” recommendation from an issues program. In accordance with this guidance, FPL Energy Seabrook prepared the required technical justification that determined the proposed deviation meets the same objective and intent, or level of conservatism exhibited by the original work package and clearly states how long the deviation will be in effect. The justification for deviation was processed as follows:

- 1) The deviation and basis is documented in the Corrective Action Program
- 2) A knowledgeable materials expert independent of FPL Energy Seabrook concurs with the deviation.
- 3) The FPL Chief Nuclear Officer concurs with the deviation.
- 4) Notification/justification of the deviation has been provided to the EPRI MRP (issuing program), which has the responsibility to inform the other MRP members and the NEI Materials Technical Advisory Group (MTAG).

Should you require further information regarding this matter, please contact Mr. Michael Ossing, Engineering Support Manager, at (603) 773-7512.

Very truly yours,

FPL Energy Seabrook, LLC



Gene F. St. Pierre
Site Vice President

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