

June 8, 2006

MEMORANDUM TO: Darrell J. Roberts, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Victor Nerses, Senior Project Manager
Plant Licensing Branch I-2 */RA by R. Ennis for/*
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SEABROOK STATION, UNIT NO. 1 - FACSIMILE TRANSMISSION,
DRAFT REQUEST FOR ADDITIONAL INFORMATION TO BE
DISCUSSED IN AN UPCOMING CONFERENCE CALL (TAC NO.
MD2190)

The attached draft request for additional information (RAI) was transmitted by facsimile on June 8, 2006, to Mr. M. O'Keefe, at FPL Energy Seabrook, LLC. This draft RAI was transmitted to facilitate the technical review being conducted by the Nuclear Regulatory Commission (NRC) staff and to support a conference call with DNC in order to clarify certain items in the licensee's submittal. The RAI is related to DNC's submittal dated June 7, 2006, regarding a one time Technical Specification change in the allowed outage time for the containment enclosure emergency air cleanup systems with one inoperable enclosure air handling fan. Review of the draft RAI would allow DNC to determine and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket No. 50-443

Enclosure:
As stated

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DRAFT

REQUEST FOR ADDITIONAL INFORMATION

SEABROOK STATION, UNIT NO 1

(TAC NO. MD2190)

By letter dated June 7, 2006, FPL Energy Seabrook, LLC (FPLE or the licensee) submitted License Amendment Request No. 05-10, requesting a change to the Technical Specifications (TSs) for Seabrook Station, Unit No. 1 (Seabrook). The proposed change would revise TS 3.6.5.1, "Containment Enclosure Emergency Air Cleanup Systems" to increase the TS allowed outage time (AOT) with one inoperable enclosure air handling fan (EAHF) from 7 days to 14 days, on a one-time basis. The extension would allow continued operation of Seabrook while repairs and related testing of the inoperable EAHF (EAH-FN-31B)1A) are completed. The Nuclear Regulatory Commission (NRC) staff requests the following additional information to complete its review.

1. Section 5.0 page 7 states that the probabilistic risk assessment (PRA) model is a full scope model. This statement implies to the staff that all initiating events, including internal fires and floods, are included in the model. However, page 9 states that fires and internal flooding are not included. Regulatory Position 2.3.2 of Regulatory Guide 1.177 states "For changes to TS requirements defined for the power operation mode, the scope of analysis should include internal fires and flooding if appropriate (e.g., when the subject TS equipment is located in areas identified as vulnerable to fires and flood)." The licensee is requested to provide a basis as to why internal fires and flooding risk is not relevant to the proposed TS change, or to provide applicable quantitative or qualitative analyses of these risks during the proposed extension of the limiting condition of operation 3.6.5.1, including any compensatory measures which may be necessary to reduce the likelihood of such events. Specifically, the staff is concerned about fires or floods in areas of the plant which could disable the remaining operable EAHF, either directly impacting the fan, directly interrupting normal AC power, or causing a loss of offsite power and failure of the diesel generator supporting the fan.
2. Section 5.0 page 9 identifies that the containment enclosure emergency air cleanup system is modeled in the PRA, and the success criteria of the system is for one train to operate for the 24-hour mission time. The submittal does not address the severe accident mitigation functions provided by the system in the PRA model, and the failure effects if the system is unavailable. The licensee has identified in Section 3.0 page 4 two specific design functions of the system: 1) control of radiological releases following a loss of coolant accident, and 2) area and equipment cooling for selected safety-related components. The licensee is requested to confirm how the PRA models the EAHFs, by providing a comparison of the design basis functions with the PRA modeled functions, and justify that any differences would not impact the incremental conditional core damage probability (ICCDP) and incremental conditional large early release probability (CLERP) results.

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3. Section 5.0 page 10 provides the quantitative results of the internal events ICCDP analysis, and compares the calculated risk of completing repairs while operating over a 14-day period ($1.31E-6$ ICCDP), compared to the risk of shutting down to conduct repairs ($1.5E-6$ ICCDP). The staff is unable to confirm the validity of the analyses. Specifically, the licensee identified that the 14-day ICCDP for on-line repair is $1.31E-6$, which represents the delta risk above the nominal full power risk over 14 days. The staff infers that the seven day ICCDP would be 50% of this value, or approximately $6.5E-7$. The licensee states (page 10) that if it were to shut down the plant to repair the inoperable EAHF, an additional ICCDP risk of $2.0E-7$ to $3.0E-7$ would be incurred for shutting down and returning to power. The staff calculates that the total risk of operating for 7 days, then shutting down to repair the EAHF and return the unit to service, would involve $8.5E-7$ to $9.5E-7$ ICCDP, which is inconsistent with the licensee's estimate of $1.5E-6$. The licensee is requested to provide a more detailed basis for its ICCDP value of $1.5E-6$ for shutting down to make repairs.