



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

FPL Energy Seabrook Station  
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June 9, 2006  
SBK-L-06132  
Docket No. 50-443

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

Seabrook Station  
Revised Response to Request for Additional Information Regarding  
Emergency License Amendment Request 06-07  
"Containment Enclosure Emergency Air  
Cleanup System Allowed Outage Time One Time Change"

Reference: FPL Energy Seabrook, LLC letter SBK-L-06131 to USNRC, "Response to Request for Additional Information Regarding Emergency License Amendment Request 06-07, Containment Enclosure Emergency Air Cleanup System Allowed Outage Time One Time Change," dated June 8, 2006. FPL Energy Seabrook,

FPL Energy Seabrook, LLC (FPL Energy Seabrook) responded to the NRC Staff's request for additional information (RAI) on June 8, 2006. Subsequent to the submittal, discussions with the Region I Senior Risk Analyst determined that the shutdown risk would be more appropriately characterized utilizing a different methodology. FPL Energy Seabrook's revised response to RAI 3 is enclosed and supersedes the June 8, 2006 response for RAI 3. This revised response does not change FPL Energy Seabrook's overall conclusion regarding the Emergency License Amendment Request and the inherent safety benefit of repairing the emergency air handling fan motor without shutting the plant down.

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

Very truly yours,

FPL Energy Seabrook, LLC



Gene St. Pierre  
Site Vice President

A001

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

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

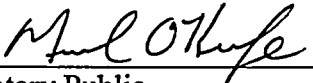
Oath and Affirmation

I, Michael Kiley, Station Director of FPL Energy Seabrook, LLC hereby affirm that the information and statements contained within this correspondence are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

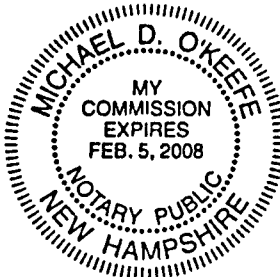
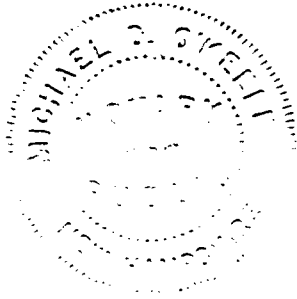
Sworn and Subscribed

Before me this

9 day of June, 2006

  
\_\_\_\_\_  
Notary Public

  
\_\_\_\_\_  
Michael Kiley  
Station Director



Enclosure to SBK-L-06132

### Request 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.

### Response 3

FPL Energy Seabrook has determined that the original response applied the risk methodology to the additional 7 days of proposed allowed outage times thereby providing a non-conservative estimate of the total risk involved in the unit shutdown. The total ICCDP for repairing the fan at power, using the entire 7 days of additional allowed outage time (AOT) is approximately  $1.31 E-06$  without external events. Our best estimate of the risk from operating to the end of the existing AOT expiration is approximately  $6.5 E-07$  and the best estimate of the risk from shutting down to repair the fan and returning to power is approximately  $2.0 E-7$ . This yields a total risk from operating to the end of the existing AOT, shutting down to repair the fan and returning to power of approximately  $8.5 E-7$ .

However, this re-characterization of the total risk involved in shutting down the unit does not change FPL Energy's conclusion that the best option from an overall perspective is to remain at power and repair the EAH fan. The plant is optimized to operate at full power with all systems in their normal alignments, all automatic functions available and the maintenance related configuration closely controlled in accordance with 10CFR50.65(a)(4). Shutting down the plant requires significant human actions and realigning systems while the plant maneuvers through the various modes. The function of EAH is still required in Modes 3, 4 and 5, so risk is still elevated above a normal shutdown until the EAH fan is returned to service.