

June 29, 2007

MEMORANDUM TO: Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: G. Edward Miller, Project Manager */ra/*
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SEABROOK STATION, UNIT NO. 1 - DRAFT REQUEST FOR
ADDITIONAL INFORMATION (RAI), CONVERSION TO NEI 99-01,
REVISION 4, EMERGENCY ACTION LEVEL BASIS (TAC NO. MD3927)

The attached draft request for additional information (RAI) was transmitted by facsimile on June 26, 2007, to Mr. Gary Kilby, at FPL Energy, Seabrook, LLC (FPLE). 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 FPLE in order to clarify certain items in the licensee's submittal. The draft RAI is related to FPLE's January 31, 2007, which requested to implement the Emergency Action Levels contained in the Nuclear Energy Institute document, NEI 99-01, "Methodology for Development of Emergency Action Levels' Scheme," for the Seabrook Station, Unit No. 1. . The draft questions were sent to ensure that the questions were understandable, the regulatory basis for the questions was clear, and to determine if the information was previously docketed. Additionally, review of the draft RAI would allow FPLE to determine and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not represent an NRC staff position.

Docket No. 50-443

Enclosure:
As stated

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As stated

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DATE	6/29/07	6/21/07

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DRAFT
REQUEST FOR ADDITIONAL INFORMATION

CONVERSION TO NEI 99-01 EMERGENCY ACTION LEVELS

FPL ENERGY SEABROOK, LCC

SEABROOK STATION, UNIT NO. 1

DOCKET NO. 50-443

By letter dated January 31, 2007, FPL Energy Seabrook, LLC submitted a request for NRC review and approval to implement the Emergency Action Levels contained in the Nuclear Energy Institute document, NEI 99-01, "Methodology for Development of Emergency Action Levels' Scheme," for the Seabrook Station, Unit No. 1. The NRC staff finds that the following information is required to complete its review:

RAI #	EAL	Question
1	Definitions	The definition for SABOTAGE is not as defined in NEI 99-01 R4. Justify the inconsistency or use the NEI 99-01 R4 definition.
2	AU1	1. EAL 1a and 1b both have a 60-min component. Can this be implied to mean 120 minutes? Is the 1b 60-minute component required? Explain. 2. Explain why the ODCM values are not included in EAL 2. 3. 3 rd paragraph of Bases: How will you make sure that this EAL is declared if release start time is unknown or when it is determined that the release will exceed 60-min?
3	AU2	Explain why the actual indicators are not included in EAL 1a or include the indicators.
4	AA1	1. EAL 1a and 1b both have a 15-min component. Can this be implied to mean 30 minutes? Is the 1b 15-minute component required? Explain. 2. Explain why the ODCM values are not included in EAL 3. 3. 3 rd paragraph of Bases: How will you make sure that this EAL is declared if release start time is unknown or when it is determined that the release will exceed 60-min?
5	AA3	EAL 2: The use of the term UNPLANNED is inappropriate as defined in the 1 st paragraph of the Bases. Correct discrepancy or justify.
6	CU1	Please explain what instrumentation you have available in these operating modes to make this determination. Refer to the approved EAL FAQ for this EAL.
7	CU3/CA3 SU1/SA5 SS1/SG1	1. Is the use of SEPS controlled in your Tech Specs?

ENCLOSURE

RAI #	EAL	Question
		2. Explain why proposed NEI 99-01 R5 wording is not used here.
8	CA4	EAL 4: Is 10 psig within the calibrated range of the instrumentation used for this? What is the scale of the instrumentation?
9	CS2	EAL 2: Does the use of the term COMBINATION imply that you need more than one of these indicators to make the declaration? Justify or correct.
10	CG1	1. EAL 2: Does the use of the term COMBINATION imply that you need more than one of these indicators to make the declaration? Justify or correct. 2. EAL 3: Does the 52 psig value take into account freeze seals and nozzle dams? Explain why proposed NEI 99-01 R5 wording is not used here.
11	E-HU1	Please explain why you are seeking approval for an EAL that is usually based upon your SAR when you've been approved for an ISFSI? It does not appear that you have an approved SAR yet. Please explain.
12	FB Matrix	The table was incomplete. Provide a complete table for review.
13	HU1	1. EAL 1: How is an earthquake 'recognized'? Explain why the logic for EAL 1.b.1 is not "OR" with 1.b.2? Explain why proposed NEI 99-01 R5 wording is not used here. 2. EAL 2b: What instrument is used and what is it's calibrated range? 3. EAL 3: Explain why proposed NEI 99-01 R5 wording is not used here.
14	HU2	Explain how the requirements of paragraph 2 of the Bases are reconciled with the wording of the EAL. Specifically, does ANY fire within the PA, not extinguished within 15-min, cause a declaration?
15	HU3	Explain in more detail why EAL 1.b was included or remove it.
16	HA1	1. Explain, if 1a and 1b are met, what value 1c has on the EAL. 2. EAL 3: Explain why proposed NEI 99-01 R5 wording is not used here.
17	HA4	Is Security Shift Supervision trained to recognize Radiological Sabotage? Explain why Bulletin 2005-02 was not followed.
18	HS4	Carried over misspelling of HOSTILE.
19	SU5	Explain how you will know that unidentified leakage is from RCS?
20	SU6/CU6	What telephones are you referring to (PABX, cell, satellite, etc.)? Can the NAS contact the NRC? Why are you limiting yourself to the ENS line?
21	SA2/SS2/SG2	Explain why proposed NEI 99-01 R5 wording is not used here.
22	SS6	Explain why proposed NEI 99-01 R5 wording is not used here.