FPL Energy
Seabrook Station

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

October 15, 2007

SBK-L-07142
Docket No. 50-443

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

Seabrook Station

Correction to License Amendment Request (LAR) 07-02, Application to Revise the Technical Specifications Regarding Control Room Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process

Reference:

FPL Energy Seabrook, LLC letter SBK-L-07112, Application to Revise the Technical Specifications Regarding Control Room Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process, July 17, 2007.

In the referenced letter, FPL Energy Seabrook, LLC submitted a request for an amendment to the technical specifications (TS) for Seabrook Station. The proposed amendment would modify TS requirements related to control room envelope habitability in accordance with TSTF-448, Revision 3.

The proposed amendment incorrectly numbered a new surveillance requirement associated with limiting condition for operation (LCO) 3.7.6.1, Control Room Emergency Makeup Air and Filtration System, as SR 4.7.6.2. The number assigned to this new surveillance requirement is incorrect because SR 4.7.6.2 already exists in the current TS and is associated with LCO 3.7.6.2, Control Room Air Conditioning Subsystems. This letter provides a correction to the referenced submittal by renumbering the new surveillance requirement associated with LCO 3.7.6.1 as SR 4.7.6.1.g. This correction affects three pages in the amendment request: (1) page 5, section 2.3, (2) TS page 3/4 7-18 in the markup of TS 3.7.6.1, and (3) page 6 of the insert to the proposed TS Bases change. The corrected pages are enclosed with this letter.

A102

NRR

The change to correct LAR 07-02 by renumbering the new surveillance requirement associated with LCO 3.7.6.1 is purely an editorial change and does not alter the conclusion in the referenced submittal that the proposed change does not involve a significant hazard consideration pursuant to 10 CFR 50.92

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
LAR 07-02 corrected pages (3)

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

Mr. Christopher M. Pope, Director Homeland Security and Emergency Management
New Hampshire Department of Safety
Division of Homeland Security and Emergency Management
Bureau of Emergency Management
33 Hazen Drive
Concord, NH 03305

Enclosure

FPL Energy
Seabrook Station

AFFIDAVIT

SEABROOK STATION UNIT 1

Facility Operating License NPF-86
Docket No. 50-443

Correction to License Amendment Request (LAR) 07-02, Application to Revise the Technical Specifications Regarding Control Room Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process
"

I, Gene F. St. Pierre, Site Vice President of FPL Energy Seabrook, LLC hereby affirm that the information and statements contained within this correction to License Amendment Request 07-02 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
15th day of October, 2007

Shirley Sweeney
Notary Public

Gene St. Pierre
Gene St. Pierre
Site Vice President

SHIRLEY SWEENEY
MY COMMISSION EXPIRES OCT. 6, 2009
NOTARY PUBLIC
NEW HAMPSHIRE

This LAR also adds a CRE Habitability Program as TS 6.7.6.1. TS 6.7.6.1.b. addresses the element related to configuration control. The Model Safety Evaluation for this CLIIP references RG 1.196 for guidance in implementing this element of the program. Also described is that RG 1.196 endorsed NEI 99-03 with exceptions specific to this element. RG 1.196 did not endorse the method of equating a breach size to an inleakage flow rate. Seabrook does use a breach control method that equates breach size to the CREMAFS design filtered pressurization airflow rate and differential pressure limit. This method does not equate breach sizes to or result in any increase in inleakage flow rate.

GL 2003-01 discusses various CRE design issues that could result in unfiltered inleakage above that assumed in design evaluations, and result in exceeding design basis radiation exposure limits. In response to GL 2003-01, the review performed of the design bases of the Seabrook CRE Habitability Systems only identified one potential source of unfiltered inleakage. The other examples provided in GL 2003-01 were determined to not be design issues at Seabrook. The one potential source of unfiltered inleakage was through the instrument air components in the CRE. This unfiltered inleakage resulted from the normal air consumption of air operated components located within the CRE. This postulated air inleakage is not affected by changes in the filtered pressurization airflow rate or CRE pressure.

The breach control method utilized at Seabrook equates a breach size to an outflow of air from the CRE. This outflow of air is maintained below the maximum air pressurization flow rate provided by the CREMAFS, with margin. The outflow of air is also maintained such that the differential pressure between the CRE and all adjacent areas remains greater than or equal to the CREMAFS design bases minimum differential pressure. This breach control method will not result in any increase in unfiltered inleakage above that determined by test. Therefore, the CRE Habitability Program being implemented in response to this LAR will utilize this breach control method in addition to the method described in RG 1.196, and originally added by TSTF-287.

2.3. License Condition Regarding Initial Performance of New Surveillance and Assessment Requirements

FPL Energy Seabrook proposes the following as a license condition to support implementation of the proposed TS changes:

> Upon implementation of Amendment No. xxx adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR ***4.7.6.1.g***, in accordance with TS 6.7.6.l.c. (i), the assessment of CRE habitability as required by Specification 6.7.6.lc. (ii), and the measurement of CRE pressure as required by Specification 6.7.6.l.d, shall be considered met. Following implementation:
>
> > (a) The first performance of SR ***4.7.6.1.g***, in accordance with Specification 6.7.6.l.c. (i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 4.0.2, as measured from August 2003, the date

SURVEILLANCE REQUIREMENTS (Continued)

2) Verifying that upon generation of an 'S' test signal, the following automatic system functions occur:

   a. The normal makeup air fan(s) trip off and the normal makeup air isolation damper(s) close;

   b. The control room exhaust subsystem isolation damper(s) close, and the exhaust fan trips off;

   c. The control room emergency makeup air and filtration subsystem actuates with flows through the HEPA filters and charcoal adsorber banks;

3) Verifying that upon generation of Remote Intake High Radiation test signal, the following automatic system functions occur:

   a. The normal makeup air fan(s) trip off and the normal makeup air isolation damper(s) close;

   b. The control room exhaust subsystem isolation damper(s) close, and the exhaust fan trips off;

   c. The control room emergency makeup air and filtration subsystem actuates with flows through the HEPA filters and charcoal adsorber banks;

~~4) Verifying that the Control Room Emergency Makeup Air and Filtration Subsystem maintains the control room at a positive pressure of greater than or equal to 1/8 inch Water Gauge at less than or equal to a pressurization flow of 600 cfm relative to adjacent areas during system operation; and~~

4 → 5) Verifying that the heaters dissipate at least 3.24 kW (based on design rated voltage of 460V) when tested in accordance with ANSI N510-1980.

e. After each complete or partial replacement of a HEPA filter bank, by verifying that the filtration system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than .05% in accordance with ANSI N510-1980 for a DOP test aerosol while operating the system at a flow rate of 1100 cfm ± 10%; and

f. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the filtration system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than .05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 1100 cfm ± 10%.

g. By performing required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.

SURVEILLANCE REQUIREMENTS

SR 4.7.6.1

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not too severe, testing each train once every month provides an adequate check of this system. Monthly heater operations dry out any moisture accumulated in the charcoal from humidity in the ambient air. Systems with heaters must be operated for ≥10 continuous hours with the heaters energized. The 31-day Frequency is based on the reliability of the equipment and the two-train redundancy.

SRs also periodically test the performance of the HEPA filter, charcoal adsorber efficiency, minimum flow rate, and the physical properties of the activated charcoal.

The SRs verify that each CREMAFS train starts and operates on test actuation signals. The Frequency of 18 months is based on industry operating experience and is consistent with the typical refueling cycle.

~~SR 4.7.6.2~~

~~This~~ SR ***4.7.6.1.g*** verifies the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

The CRE is considered habitable when the radiological dose to CRE occupants calculated in the licensing basis analyses of DBA consequences is no more than 5 rem TEDE and the CRE occupants are protected from smoke. This SR verifies that the unfiltered air inleakage into the CRE is no greater than the flow rate assumed in the licensing basis analyses of DBA consequences. When unfiltered air inleakage is greater than the assumed flow rate, Action b. must be entered. Action b.3 allows time to restore the CRE boundary to OPERABLE status provided mitigating actions can ensure that the CRE remains within the licensing basis habitability limits for the occupants following an accident. Compensatory measures are discussed in Regulatory Guide 1.196, Section C.2.7.3 (Ref. 5), which endorses, with exceptions, NEI 99-03, Section 8.4 and Appendix F (Ref. 6). These compensatory measures may also be used as mitigating actions as required by Action b.2. Options for restoring the CRE boundary to OPERABLE status include changing the licensing basis DBA consequence analysis, repairing the CRE boundary, or a combination of these actions. Depending upon the nature of the problem and the corrective action, a full scope inleakage test may not be necessary to establish that the CRE boundary has been restored to OPERABLE status.

REFERENCES