



FPL Energy
Seabrook Station

FPL Energy Seabrook Station
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March 18, 2008

Docket No. 72-63

SBK-L-08038

Director, Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Seabrook Station
Notification of Intent to Use Previous Pre-Operational
Testing and Training Exercise Activity to Meet Requirements

Reference: "Request for NRC Position on Dry Run Activities for the NUHOMS® HD Dry Cask Storage System at the North Anna Independent Spent Fuel Storage Installation," James R. Hall to Gerald T. Bischof, dated February 15, 2008

Pursuant to the requirements of the NUHOMS® HD Model 32PTH Dry Shielded Canister (DSC) Certificate of Compliance (CoC) 72-1030, Condition 8, and in order to satisfy the requirements of a general license to operate an Independent Spent Fuel Storage Installation (ISFSI) under 10 CFR 72, Subpart K – General License for Storage of Spent Fuel at Power Reactor Sites, FPL Energy Seabrook, LLC (FPL Energy Seabrook) must perform a pre-operational testing and training exercise or "dry run" activities. FPL Energy Seabrook plans to use the NUHOMS® HD Model 32PTH DSC with the concrete Model HSM (Horizontal Storage Module)-H. The intent of this letter is to provide early communication to the Staff of the intent of FPL Energy Seabrook to credit two specific activities demonstrated to the NRC at Florida Power & Light Company's St. Lucie Plant the week of February 25, 2008 as the bases for compliance with the CoC requirements during the dry run activities at the Seabrook Station site.

In the referenced letter, the NRC informed the licensee that formal review and approval of their request was not required. Instead, the NRC considered the licensee's request to be a description of the bases for the licensee's determination that it will meet the requirements of Certificate of Compliance (CoC) No. 1030 by taking credit for previous pre-operational testing and training activities at another site.

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Specifically, FPL Energy Seabrook intends to use the St. Lucie demonstration of specific portions of Condition 8d, DSC transfer to the HSM-H, and Condition 8e, DSC retrieval from HSM-H, of CoC No. 1030. The specific portions are the insertion and the retrieval of the DSC into and out of the HSM-H. The insertion and retrieval were demonstrated to the NRC staff at the St. Lucie plant during its dry run exercise the week of February 25, 2008. FPL Energy Seabrook will be using essentially the same personnel, procedures, training and equipment used at St. Lucie. Only site specific nomenclature will be changed in the procedures. In fact, the equipment and personnel will be relocated to the Seabrook Station site following completion of the St. Lucie loading campaign.

FPL Energy Seabrook intends to demonstrate all portions of the DSC transfer to the HSM-H up to the actual insertion of the DSC. The demonstration will include the alignment and docking of the transfer trailer with the HSM-H and verification that the support skid positioning system and hydraulic ram system are operating properly.

Based on the use of the same personnel, procedures, training and equipment for both the St. Lucie and Seabrook dry runs, and that the NRC has found that similar measures were in compliance with CoC requirements in prior inspections, FPL Energy Seabrook believes its bases for using portions of the St. Lucie demonstration to meet the requirements of Conditions 8d and 8e of CoC No. 1030 for the use of NUHOMS® System at Seabrook Station is reasonable.

Should you have any questions regarding this letter, please contact Mr. Brett Plummer, Manager of Projects, at (603) 773-7466.

Very truly yours,

FPL Energy Seabrook, LLC



Gene St. Pierre
Site Vice President

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