



FPL Energy
Seabrook Station

FPL Energy Seabrook Station
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August 8, 2008

SBK-L-08125
Docket No. 50-443

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Seabrook Station
Response to Clarifying Questions
Related to Steam Generator Inspections Performed During the Eleventh Refueling Outage

References:

1. FPL Energy Seabrook letter to NRC, Response to Request for Additional Information Related to Steam Generator Inspections Performed During the Eleventh Refueling Outage, dated June 18, 2008.
2. Conference call between the NRC and FPL Energy Seabrook, July 15, 2008.

In Reference 1, FPL Energy Seabrook, LLC (FPL Energy Seabrook) provided its response to a request for additional information (RAI) regarding the Steam Generator Inservice Inspection Report for the Seabrook Station eleventh refueling outage. In Reference 2, the NRC posed three clarifying questions related to the FPL Energy Seabrook response to the RAI. The attachment to this letter provides the FPL Energy Seabrook response to the three clarifying questions.

Should you have any questions regarding the response to the clarifying questions, please contact Mr. Paul R. Willoughby at (603) 773-7350.

Sincerely,

Gene St. Pierre
Site Vice President

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

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Attachment to SBK-L-08125

Attachment
Response to Clarifying Questions Related to Steam Generator Inspections
Performed During the Eleventh Refueling Outage

Clarifying Question 1. Please clarify the cumulative EFPM (since the start of commercial operation) for all outages in the 90 EFPM sequential period. Please provide the cumulative EFPM at OR01.

Please note the response to RAI 1 is not clear on the starting point for the cumulative EFPM provided in Table 1 (e.g. is the cumulative EFPMs starting after the accumulation of 120 EFPM or is it the cumulative since OR08). In addition, if Seabrook had accumulated 116 EFPM (per 10/12/04 letter) on its steam generators in OR08, it is not clear how you have calculated the start and stop points of the sequential periods considering the 120 month sequential period starts after the first in-service inspection (which presumably was 12 to 16 EFPMs in duration).

FPL Energy Response 1: As discussed with the NRC staff on July 15, 2008, FPL Energy provides the following tabulation of EFPM by cycle, cumulative EFPM per inspection period, and cumulative EFPM for each refueling outage.

		Period	
	<u>Cycle EFPM</u>	<u>Cumulative. EFPM</u>	<u>Cumulative EFPM</u>
OR01	1 st ISI	10.90	10.90
<u>1st Period 120 EFPM</u>			
OR02	Inspection	10.60	21.50
OR03	Inspection	14.40	35.90
OR04	Inspection	14.50	50.40
OR05	Inspection	16.60	67.00
OR06	Inspection	17.80	84.80
OR07	Inspection	16.80	101.60
OR08	Inspection	14.90	116.50
	End Point 1 st Period	120.00	
<u>2nd Period 90 EFPM</u>			
OR09	Inspection	15.50	132.00
OR10	SKIP	16.80	148.80
OR11	Inspection	16.80	165.60
OR12	SKIP	16.80	182.40
OR13	Inspection	16.80	199.20
OR14	SKIP	16.80	216.00
	End Point 2 nd Period	90.00	

Notes:

- 1) EFPM is estimated for OR13 and future.
- 2) As shown in the tabulation above, the first inspection period of 120 EFPM started after the first inspection in OR01.

Clarifying Question 2. The response to RAI 3 is not clear on whether any other foreign objects/loose parts were detected. Please confirm that no other parts other than those described in response to RAI 3 were detected during FOSAR during OR11. Also, in the response to RAI 3, previous inspections of the tube support plate quatrefoil shaped holes were discussed. Please clarify when these previous inspections were performed.

FPLE Response: No other parts were found during FOSAR. Tube support plate inspections using UBIB (Upper Bundle In Bundle) tool were conducted during OR07 (Fall 2000) and OR08 (Spring 2002).

Clarifying Question 3. In tables 4 and 8 (SG A and C), it appears that FPLE had detected wear scars that occurred in prior cycles that were attributed to foreign objects/ loose parts that are no longer present at these locations. Please confirm this understanding. In tables 6 and 10 (SG B and D), it appears the licensee detected new wear indications (i.e. not present in prior inspections) that were attributed to foreign objects. Please confirm that no foreign objects/loose parts (or potential loose parts for eddy current data) exist at these locations.

FPLE Response: The staff's understanding of wear attributed to foreign objects/loose parts in prior cycles is correct. There are no PLP (Possible Loose Part) signals at these tube locations. Tables 6 and 10 list new wear scars detected in OR11. There were no PLP signals associated with these indications. Visual inspections were not performed at these locations as no PLP was present and two of the locations were at the 6th tube support plate.