



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 29, 2008

Mr. Gene St. Pierre  
Vice President North  
Seabrook Nuclear Power Plant  
FPLE Energy Seabrook, LLC  
PO Box 300  
Seabrook, NH 03874

**SUBJECT: SEABROOK STATION – RE: GENERIC LETTER 2008-01, “MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS,” PROPOSED ALTERNATIVE COURSE OF ACTION (TAC NO. MD7878)**

Dear Mr. St. Pierre:

On January 11, 2008, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems” (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the “subject systems”) are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the “9-month submittal”) of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the “3-month submittal”) of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

By letter dated May 9, 2008, Florida Power and Light Energy Seabrook, LLC (the licensee) submitted a 3-month submittal to GL 2008-01 for Seabrook Station. The NRC staff’s assessment of the responses for Seabrook Station is contained in the enclosure to this letter.

The NRC staff reviewed the licensee’s proposed alternative course of action and the associated basis for acceptance and concluded that for Seabrook Station, with the exception of the clarifications and associated requests discussed in the enclosure, they are acceptable. This letter acknowledges the licensee’s intent to implement its proposed alternative course of action provided that implementation is consistent with the clarifications and associated requests discussed in the enclosure.

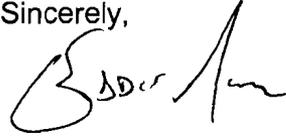
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G. St. Pierre

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If you have any questions regarding this letter, please feel free to contact me at (301) 415-2481.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Edward Miller". The signature is fluid and cursive, with the first name "G." being the most prominent.

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

Docket No. 50-443

Enclosure:  
As stated

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U.S. NUCLEAR REGULATORY COMMISSION

ASSESSMENT OF 3-MONTH RESPONSE

TO GENERIC LETTER 2008-01

SEABROOK STATION

DOCKET NO. 50-443

1. Background

On January 11, 2008, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the "subject systems") are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance. Specifically, the GL requested licensees to provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the "9-month submittal") of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the "3-month submittal") of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

2. Licensee's Proposed Alternative Course of Action

By letter dated May 9, 2008, Florida Power and Light Energy Seabrook, LLC (the licensee) submitted a 3-month submittal to GL 2008-01 for Seabrook Station. The licensee stated they cannot meet the requested 9-month schedule for submitting the requested information because walkdowns of the GL subject systems, including emergency core cooling system (high-head safety injection, intermediate head safety injection and low-head safety injection), shutdown cooling system, and containment spray system cannot be completed for the following reasons: (1) the requirement to enter high radiation areas; (2) the need to remove the insulation from piping; and, (3) the potential need for scaffold erection to access piping segments.

The licensee also stated that reviews of plant design, licensing basis documentation, and system operating and testing procedures will be completed during the 9-month timeframe prescribed in the GL (i.e., by October 11, 2008). As an alternative course of action, the licensee plans to complete walkdowns of those systems that are inaccessible during power operation in

the next refueling outage, which is presently scheduled for fall 2009. The licensee's letter dated May 9, 2008, listed the following commitments:

1. Submit an initial GL 2008-01 submittal by October 11, 2008, that includes the evaluation results for the completed licensing and design basis reviews, the operating and test procedure reviews, and the readily accessible walkdown/design reviews, as well as the schedule for any corrective actions that may be required based on these evaluations.
2. Submit a complete GL 2008-01 submittal based on the final walkdowns with completed evaluation results within 90 days of the [end of the] fall 2009 refueling outage but no later than February 28, 2010.

The licensee stated that the alternative course of action is acceptable based on the following:

1. The emergency core cooling system (ECCS), shutdown cooling and containment spray systems are routinely tested in accordance with the Technical Specifications (TSs).
2. Ultrasonic examination is performed monthly to identify voiding at high points in the suction and discharge piping of the ECCS.
3. Indications of gas intrusion, above the surveillance limits, are entered into the Seabrook Station Corrective Action Program for resolution.

Based on the above considerations, the licensee stated it has confidence that the Seabrook Station ECCS, shutdown cooling, and containment spray systems can fulfill their required functions, based upon years of operating and testing experience. As such, the licensee concluded that completing walkdowns of those systems that are inaccessible during power operation outside of the requested 9-month timeframe is an acceptable alternative course of action.

### 3. NRC Staff Assessment

The NRC staff finds that, with the exception of the clarifications and associated requests discussed below, the licensee's proposed alternative course of action is acceptable based on the above-described operating experience, testing, procedures and corrective actions associated with managing gas accumulation at Seabrook Station.

The NRC staff acknowledges the licensee's proposed alternative course of action and the associated basis. As clarified below, the NRC staff restates its understanding of the licensee's intent to submit the information requested in GL 2008-01 as follows:

1. 9-Month Initial Submittal - For the portions of the subject systems that are accessible prior to the Seabrook Station, fall 2009 refueling outage, provide all GL requested information to the NRC by October 11, 2008.
2. 9-Month Supplemental (Post-Outage) Submittal - Except for the long-term items described below, provide all remaining GL requested information for the subject systems to the NRC within 90 days of the end of the fall 2009 refueling outage but no later than February 28, 2010, at Seabrook Station.

For each of these two submittals (the 9-month initial and supplemental submittals), and consistent with the information requested in the GL, the licensees should provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

The NRC staff noted that the licensee's submittal dated May 9, 2008, did not mention other potential long-term actions that are identified in the GL. For instance, the industry is assessing whether it is necessary to perform pump testing to determine the allowable limits on ingested gas volume in pump suctions, as well as the need to develop an analysis capability to adequately predict void movement (entrapped gas) from piping on the suction side of the pumps into the pumps. It is unlikely this industry effort will be complete for the 9-month initial or supplemental submittals. Further, TS changes may be necessary to reflect the improved understanding achieved during response to the GL, but these cannot be fully developed for the 9-month initial or supplemental submittals. A Technical Specifications Task Force traveler may provide a generic example that can be adopted by licensees. The NRC staff requests that the licensee address in its 9-month submittal how it plans to track such long-term actions (e.g., Corrective Action Program and/or commitment tracking). The NRC plans to perform follow-up inspections of licensee responses to GL 2008-01 at all plants using a Temporary Instruction inspection procedure.

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G. St. Pierre

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If you have any questions regarding this letter, please feel free to contact me at (301) 415-2481.

Sincerely,

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

Docket No. 50-443

Enclosure:  
As stated

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