



**FPL Energy**  
**Seabrook Station**

**FPL Energy Seabrook Station**  
**P.O. Box 300**  
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September 30, 2008

Docket No. 50-443

SBK-L-08175

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

Seabrook Station

Request for Relief from Inservice Inspection Requirements

Pursuant to 10 CFR 50.55a(a)(3)(ii), FPL Energy Seabrook, LLC (FPL Energy Seabrook) requests approval for relief from inservice inspection requirements for the Seabrook pressurizer welded attachments and their associated supports.

In accordance with the ASME Boiler and Pressure Vessel Code (Code) Section XI, 1995 Edition through the 1996 Addenda, the pressurizer vessel (PZR) welded attachments and their associated supports require examination during the current 10-year interval. FPL Energy Seabrook is requesting relief from the examination requirements for the PZR welded attachments and their associated supports due to limited normal access and emergency egress concerns.

FPL Energy Seabrook submitted two previous relief requests to the NRC covering the 1<sup>st</sup> and 2<sup>nd</sup> ISI intervals. FPL Energy Seabrook is currently in its 2<sup>nd</sup> ISI interval, however, the 2<sup>nd</sup> interval relief request for the PZR attachment welds (2IR-12, Rev. 0) did not include the associated supports. The 1<sup>st</sup> interval relief (IR-12, Rev. 0) for the PZR attachment welds included the associated supports. The inadvertent omission of the supports in the 2<sup>nd</sup> interval request is corrected in the revised relief request in Attachment 1.

FPL Energy Seabrook requests review and approval of this proposal to support the Seabrook Unit 1 refueling outage in the fall of 2009. Similar alternatives have been submitted for NRC review and approval and are referenced in the attached request.

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If you have any questions regarding this submittal, please contact Mr. Michael O'Keefe,  
Licensing Manager, at (603) 773-7745.

Sincerely,

FPL Energy Seabrook, LLC

A handwritten signature in cursive script, reading "Gene St. Pierre", is written over a horizontal line.

Gene St. Pierre  
Site Vice President

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

**Attachment 1 to SBK-L-08175**

## ATTACHMENT 1

### 10 CFR 50.55a Request Relief Request in Accordance with CFR 50.55a(a)(3)(ii) 2IR-12, Revision 1

#### SECOND INTERVAL ISI RELIEF FROM INSERVICE INSPECTION REQUIREMENTS

##### ASME Code Components Affected

Code class: 1  
System: RC  
Examination Categories: B-K  
F-A  
Item No(s) : B10.10, Pressure Vessel, Welded Attachments  
F1.40, Supports other than Piping  
ISI Component ID: RC E-10 A-LUG and associated support  
RC E-10 B-LUG and associated support  
RC E-10 C-LUG and associated support  
RC E-10 D-LUG and associated support

##### Applicable Code Edition and Addenda

FPL Energy Seabrook, LLC (FPL Energy Seabrook) is currently in the 2nd 10-year in-service inspection (ISI) interval. The American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) of record for the current 10-year ISI interval is Section XI, 1995 Edition, including Addenda through 1996.

##### Applicable Code Requirement

ASME Section XI, 1995 Edition, Table IWB-2500-1, Category B-K, Welded Attachments for Vessels, Piping, Pumps and Valves, requires a surface examination of 100% of the weld length, and Table IWF-2500-1, Category F-A, Supports, requires a VT-3 visual examination of mechanical connections back to the building structure.

##### Reason for Request

Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested from performing the surface examination on the four pressurizer welded attachments and the visual examination of the associated supports on the basis that the Code requirements are impractical to achieve. A 15"

thick concrete shield wall weighing approximately 85,000 pounds surrounds the Seabrook pressurizer approximately three quarters of the way around. The clearance between the shield wall and the pressurizer vessel is approximately 9½". The north end of the pressurizer cubicle has greater vessel-to-shield wall clearance, however, that is where the pressurizer safety valve and spray piping are located. Ladders or platforms do not exist to make the examination area accessible and neither can any ladders be placed in the area due to restrictions by piping, conduit and other attachments.

The Pressurizer lugs are located on the pressurizer at elevation 23' 6". Potential access is gained by climbing a ladder on the outside of the shield wall and entering the cubicle at the top of the pressurizer at elevation 50'. Safety valve structural steel is used for footing as no platform exists in the cubicle. The FPL Energy Seabrook Safety Department evaluated the lack of normal and emergency access/egress as an unsafe work environment.

In addition to area inaccessibility, each lug is braced on two sides by large support guides which would require removal. Insulation is also wrapped around the lugs and support guides. Tools and rigging equipment to remove the support guides would be required to provide 360 degrees of access on each lug. Accessibility and removal of the support guides is impractical without a compensating increase in quality and safety.

#### **Proposed Alternative and Basis for Use**

The pressurizer attachments are subject to VT-2 visual examination as part of the system leakage test on the pressurizer vessel conducted each refueling outage as specified in Table IWB-2500-1, Examination Category B-P of the 1995 Edition through the 1996 Addenda of ASME Code, Section XI.

It is the FPL Energy Seabrook position that it is impractical to provide normal and emergency access/egress inside this highly restricted enclosure, and to remove support guides on these lugs to perform the surface and visual examinations without a compensating increase in quality and safety. It is the FPL Energy Seabrook position that, based on acceptable results of VT-2 visual examinations performed during system leakage tests, there is reasonable assurance of continued structural integrity of the subject attachments and an acceptable level of quality and safety is maintained without the performance of the B-K and F-A required examinations.

#### **Duration of Proposed Alternative**

The alternative requirements of this request will be applied for the duration of the current, 2nd 10-year ISI interval up to and including the last outage.

## **Precedents**

- A similar first interval relief request, IR-12 Rev. 0 was approved for FPL Energy Seabrook by the NRC in a letter dated September 3, 2002 (TAC No. MB2561)
- A second interval relief request, 2IR-12 Rev. 0 was approved for FPL Energy Seabrook by the NRC for the B-K components listed in this relief request in a letter dated March 21, 2001 (TAC No. MA9902)

## **Reference**

ASME Code, Section XI, 1995 Edition, including Addenda through 1996.