



July 22, 2009

SBK-L-09154

Docket No. 50-443

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

Seabrook Station

Response to Request for Additional Information
Regarding a Request for Alternative Requirements for ASME Class 1
Pressurizer Upper Level Instrumentation Lines

Reference: NextEra Energy Seabrook letter SBK-L-08204, 10 CFR 50.55a Request for Alternative Requirements for ASME Class 1 Upper Level Instrumentation Lines on the Pressurizer, December 11, 2008

In the referenced letter, NextEra Energy Seabrook, LLC (NextEra) submitted a request pursuant to 10CFR 50.55a(a)(3)(ii) for approval of an alternative to certain ASME Boiler and Pressure Code, Section III requirements applicable to the reactor coolant pressure boundary Code classification of instrumentation lines connected to the steam filled portion of the pressurizer. In an e-mail dated May 29, 2009, the NRC staff requested additional information regarding NextEra's submittal.

The attachment to this letter provides NextEra's response to the request for additional information.

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

Sincerely,

NextEra Energy Seabrook, LLC


Gene St. Pierre
Vice President - North

Attachment to SBK-L-09154

U. S. Nuclear Regulatory Commission

SBK-L-09154

Page 2

cc: S. J. Collins, NRC Region I Administrator
D. L. Egan, NRC Project Manager
W. J. Raymond, NRC Resident Inspector

ATTACHMENT

Response to Request for Additional Information Regarding a Request for Alternative Requirements for ASME Class 1 Pressurizer Upper Level Instrumentation Lines

By letter dated December 11, 2008, FPL Energy Seabrook, LLC, (the licensee) submitted a Request for Relief for the Seabrook Station. The licensee's submittal proposes allowing the Class 2 pressurizer instrumentation piping and components to remain Class 2 instead of modifying the system to be consistent with the requirements of 10 CFR 50.55a(c). The staff has reviewed the information the licensee provided that supports the proposed Relief Request and would like to discuss the following issues to clarify the submittal:

NRC Question:

1. The relief request proposes an alternative to allow 3/4" piping and 1/2" tubing portions of three small bore piping and tubing lines (RC-82-1-2501; RC-83-1-2501; & RC-86-1-2501) to remain as designed and constructed to ASME Code Section III Class 2 in lieu of upgrading the current design configuration and replacing these items (piping, tubing, and valves) to ASME Code Section III Class 1 requirements. The relief request addresses only piping/tubing and valves, and does not mention the related piping/tubing supports. The staff is requesting that the licensee provide the following information to complete the review.
 - (i) The licensee is requested to clarify whether there are any piping/tubing supports on the affected lines.
 - (ii) If there are some supports on the affected lines, then the licensee is requested to provide a justification for any differences between Code Class 1 and Class 2 pertaining to the design or examination requirements of the supports.

NextEra Response:

There are no piping/tubing supports on the affected lines. Based on the tubing restriction provided by the first section of 1/2-inch tubing, the sections of piping and tubing within the scope of this request are short, such that there is no piping or tubing supports within the scope of the relief request. Page 2 of the Attachment to SBK-L-08204 (referenced letter) provides the details of the Seabrook Station specific calculation that allows the downstream tubing to be classified as Code Class 2.

Seabrook Station design documents and stress analyses demonstrate that piping/tubing supports are not required for the components within the scope of this relief request. Each of the subject piping/tubing sections, root valves, and condensate tees, as depicted on the Table on page 1 of the Attachment to SBK-L-08204, is less than 4 inches in length.