



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

September 1, 2009

Mr. Gene F. St. Pierre
Site Vice President
Seabrook Station
NextEra Energy Seabrook, LLC
P.O. Box 300
Seabrook, NH 03874

SUBJECT: SEABROOK STATION, UNIT NO. 1 – REQUEST FOR ADDITIONAL
INFORMATION REGARDING RESPONSE TO GENERIC LETTER 2008-01
(TAC NO. MD7878)

Dear Mr. St. Pierre:

By letters dated April 9, May 9 and October 14, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML081050251, ML081350608 and ML081350608, respectively), the licensee (NextEra Energy Seabrook, LLC) provided responses to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," for Seabrook Station Unit 1 (Seabrook). On the basis of the provided information, the Nuclear Regulatory Commission (NRC) staff has concluded that additional information is required to determine that the licensee has acceptably demonstrated "that 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" as stated in GL 2008-01.

The specific information required is found in the enclosed request for information (RAI). The draft RAI questions were previously sent to Mr. O'Keefe, of your staff via e-mail on August 5, 2009. The questions were provided as drafts to ensure that the licensee understood the questions and their regulatory basis; as well as, to verify that the information was not on the docket. On August 17, 2009, a teleconference was held between the NRC staff and your staff to discuss the questions.

If you have any questions please feel free to contact me at (301) 415 2443.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Egan", with a long horizontal flourish extending to the right.

Dennis Egan, P.E., Senior Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure: RAIs

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING RESPONSE TO GENERIC LETTER 2008-01
SEABROOK STATION UNIT NO. 1
DOCKET NO. 50-443

By letters dated April 9, May 9 and October 14, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML081050251, ML081350608 and ML081350608, respectively), the licensee (NextEra Energy Seabrook, LLC) provided responses to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," for Seabrook Station Unit 1 (Seabrook). On the basis of the provided information, the Nuclear Regulatory Commission (NRC) staff has concluded that additional information is required to determine that the licensee has acceptably demonstrated "that 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" as stated in GL 2008-01.

Guidance on staff expectations is provided by Reference 1, which is generally consistent with Nuclear Energy Institute (NEI) guidance provided to the industry in Reference 2, as clarified in later NEI communications. The NRC staff recommends that the licensee consult Reference 1 when responding to the following RAIs:

1. In Reference 4, Seabrook states; "Technical Specification 3/4.5.2, ECCS [emergency core cooling system] Subsystems – Tavg Greater than or Equal to 350F" currently requires "Verifying that the ECCS piping is full of water" at least once per 31 days.

What is the frequency of surveillances for subject systems not covered under Technical Specification Surveillance Requirement (SR) 4.5.2.b, specifically in modes other than 1, 2, and 3, and also for non-ECCS subsystems?

2. Describe what kind of testing is done after venting to verify the gas was removed and to ensure gas was not transported into a high point that was previously found to be gas-free.
3. In Reference 5, Seabrook states that if gas void sizing values are unacceptable, plant operators will "take appropriate action to bring the system into compliance with the allowable values. This includes venting or using system flow to sweep the gas to an acceptable location."

How are these appropriate actions controlled?

Enclosure

4. In Reference 5, Seabrook states, "Gas voids that meet the allowable value are documented in the plant procedure data sheets and are then trended by the system engineer."

What is involved in the trending done by the system engineer?

5. In Reference 5, Seabrook states, "Based on the results of the procedure reviews, the systems are not subject to inadvertent draining when current procedures are followed."

Explain what measures are taken to guard against gas intrusion because of inadvertent draining, system realignments, incorrect maintenance procedures, or other evolutions.

6. Describe how work packages are controlled and revised due to changes in maintenance work scope, including review and reauthorization of the package and any new temporary procedures.
7. Training was not identified in the GL but is considered to be a necessary part of applying procedures and other activities when addressing the issues identified in the GL. Briefly discuss training.

References:

1. Ruland, William H., "Preliminary Assessment of Responses to Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,' and Future NRC Staff Review Plans," NRC letter to James H. Riley, Nuclear Energy Institute, (ADAMS Accession No. ML091390637), May 28, 2009.
2. Riley, James H., "Generic Letter (GL) 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Contain Spray Systems' Evaluation and 3 Month Response Template," Letter to Administrative Points of Contact from Director, Engineering , Nuclear Generation Division, Nuclear Energy Institute, Enclosure 2, "Generic Letter 2008-01 Response Guidance," March 20, 2008.
3. Kundalkar, Rajiv S., "Extension Request Regarding the Three Month Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,'" Vice President, Nuclear Technical Services, Florida Power & Light Company, (ADAMS Accession No. ML081050251), April 9, 2008.
4. St. Pierre, Gene, "Seabrook Station: Three-Month Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,'" Site Vice President, FPL Energy Seabrook, LLC, (ADAMS Accession No. ML081350608), May 9, 2008.
5. St. Pierre, Gene, "Seabrook Station: Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal,

and Containment Spray Systems," Site Vice President, FPL Energy Seabrook, LLC,
(ADAMS Accession No. ML081350608), October 14, 2008.

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Dennis Egan, P.E., Senior Project Manager
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Docket No. 50-443
Enclosure: RAIs
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