



September 25, 2009

SBK-L-09211

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

Correction to Proposed Change in License Amendment Request to Revise Technical Specification (TS) Sections 6.7.6.k, "Steam Generator (SG) Program" and TS 6.8.1.7, "Steam Generator Tube Inspection Report" for One-Time Alternate Repair Criteria

References:

1. NextEra Energy Seabrook letter SBK-L-09118, License Amendment Request 09-03, Revision to Technical Specification 6.7.6.k, "Steam Generator (SG) Program," for Permanent Alternate Repair Criteria; May 28, 2009
2. NextEra Energy Seabrook letter SBK-L-09196, License Amendment Request to Revise Technical Specification (TS) Sections 6.7.6.k, "Steam Generator (SG) Program" and TS 6.8.1.7, "Steam Generator Tube Inspection Report" for One-Time Alternate Repair Criteria; September 18, 2009

On May 28, 2009, NextEra Energy Seabrook, LLC (NextEra) submitted in Reference 1 a license amendment request to revise Seabrook Station Technical Specification (TS) 6.7.6.k, "Steam Generator (SG) Program," and TS 6.8.1.7, "Steam Generator Tube Inspection Report." The proposed changes would establish a permanent alternate repair criterion to exclude portions of the tube below the top of the steam generator tube sheet from periodic steam generator tube inspections. In Reference 2, NextEra proposed to revise the requested changes to the TS in Reference 1 to be one-time changes to TS 6.7.6.k and TS 6.8.1.7 during refueling outage 13 and the subsequent operating cycles until the next scheduled inspection of the steam generator tubing.

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NRK

One of the proposed changes in Reference 1 revised TS 6.7.6.k.c as follows:

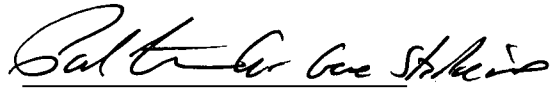
The following alternate tube repair criteria may shall be applied as an alternative to the 40% depth based criteria:

This proposed change to TS 6.7.6.k.c was inadvertently omitted from the one-time change requested in Reference 2. As a result, Attachment 1 to this letter provides a revised markup of TS page 6-13 that corrects this omission. Similarly, Attachment 2 provides a revised typed page. These revised pages should replace the corresponding pages previously submitted in Reference 2.

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

Sincerely,

NextEra Energy Seabrook, LLC



Gene St. Pierre
Vice President North

Attachments:

1. Revised Markup of Proposed Change to TS 6.7.6.k
2. Revised Typed Page of Proposed Change to TS 6.7.6.k

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

Mr. Christopher M. Pope, Director Homeland Security and Emergency
Management
New Hampshire Department of Safety
Division of Homeland Security and Emergency Management
Bureau of Emergency Management
33 Hazen Drive
Concord, NH 03305

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John Giarrusso, Jr., Nuclear Preparedness Manager
The Commonwealth of Massachusetts
Emergency Management Agency
400 Worcester Road
Framingham, Ma 01702-5399



SEABROOK STATION UNIT 1
 Facility Operating License NPF-86
 Docket No. 50-443

Correction to Proposed Change in License Amendment Request to Revise Technical Specification (TS) Sections 6.7.6.k, "Steam Generator (SG) Program" and TS 6.8.1.7, "Steam Generator Tube Inspection Report" for One-Time Alternate Repair Criteria

The following information is enclosed in support of this License Amendment Request:

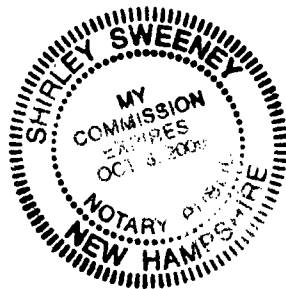
1. Revised Markup of Proposed Change to TS 6.7.6.k
2. Revised Typed Page of Proposed Change to TS 6.7.6.k

I, Paul Freeman, Plant General Manager of NextEra Energy Seabrook, LLC hereby affirm that the information and statements contained within this License Amendment Request are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

Sworn and Subscribed
 before me this
25 day of September, 2009

Shirley Sweeney
 Notary Public

Paul Freeman
 Paul Freeman
 Plant General Manager





Attachment 1

Revised Markup of Proposed Change to TS 6.7.6.k



ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS

6.7.6 (Continued)

The following alternate tube repair criteria may be applied as an alternative to the 40% depth based criteria:

- shall*
- INSERT 1*
1. During refueling outage 11 and the subsequent operating cycles until the next scheduled inspection, flaws identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet do not require plugging.

During refueling outage 11 and the subsequent operating cycles until the next scheduled inspection, all tubes with flaws identified in the portion of the tube within the region from the top of the hot leg tubesheet to 17 inches below the tubesheet shall be plugged.

- d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. During refueling outage 11 and the subsequent operating cycles until the next scheduled inspection, the portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded from inspection when the alternate tube repair criteria in TS 6.7.6.k.c are implemented. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

- INSERT 2*
1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
 2. Inspect 100% of the tubes at sequential periods of 120, 90, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 48 effective full power months or two refueling outages (whichever is less) without being inspected.

Attachment 2

Revised Typed Page of Proposed Change to TS 6.7.6.k

PROCEDURES AND PROGRAMS

6.7.6 (Continued)

The following alternate tube repair criteria shall be applied as an alternative to the 40% depth based criteria:

For refueling outage 13 and the subsequent inspection cycle, tubes with service-induced flaws located greater than 13.1 inches below the top of the tubesheet do not require plugging. Tubes with service-induced flaws located in the portion of the tube from the top of the tubesheet to 13.1 inches below the top of the tubesheet shall be plugged upon detection

- d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. For refueling outage 13 and the subsequent inspection cycle, the portion of the tube below 13.1 inches from the top of the tubesheet is excluded from this requirement. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.
 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
 2. Inspect 100% of the tubes at sequential periods of 120, 90, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 48 effective full power months or two refueling outages (whichever is less) without being inspected.