



March 16, 2010

SBK-L-10010
Docket No. 50-443

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

Seabrook Station

License Amendment Request 10-01

“Operations Manager Qualification Requirements”

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), NextEra Energy Seabrook, LLC (NextEra) is submitting License Amendment Request (LAR) 10-01 for an amendment to the Technical Specifications (TS) for Seabrook Station.

The Seabrook TS currently require that the Operations Manager shall have held a senior reactor operator license for Seabrook Station prior to assuming the Operations Manager position. The proposed change would require that the individual in the Operations Manager position meet one of the following: (1) hold a senior operator license, (2) have held a senior operator license for a similar unit, or (3) have been certified for equivalent senior operator knowledge.

The Enclosure to this letter provides NextEra’s evaluation of the change and a markup of the TS showing the proposed change. As discussed in the evaluation, the proposed change does not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the change. A copy of this LAR has been forwarded to the New Hampshire State Liaison Officer pursuant to 10 CFR 50.91(b). The Station Operation Review Committee has reviewed this LAR.

NextEra requests NRC review and approval of LAR 10-01 with issuance of a license amendment by March 30, 2011 and implementation of the amendment within 60 days.

This letter makes no new commitments or changes to any existing commitments.

ADD
NRR

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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



Paul Freeman
Site Vice President

Enclosure: NextEra Energy Seabrook's Evaluation of the Proposed Change

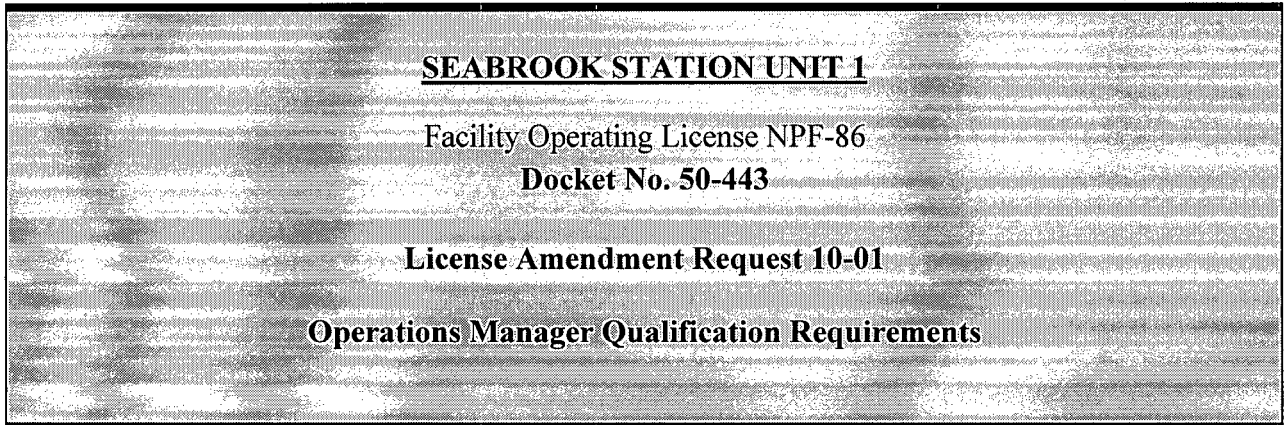
cc: S. J. Collins, NRC Region I Administrator
D. L. Egan, NRC Project Manager, Project Directorate I-2
W. J. Raymond, NRC Senior Resident Inspector

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

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




AFFIDAVIT



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

Enclosure: NextEra Energy Seabrook's Evaluation of the Proposed Change

I, Paul Freeman, Site Vice President 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.

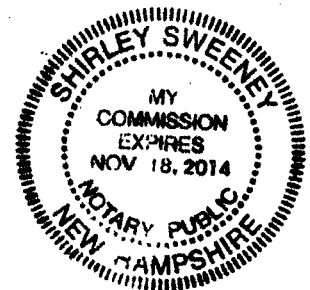


Paul Freeman
Site Vice President

Sworn and Subscribed
before me this
16 day of March, 2010



Notary Public



ENCLOSURE

NextEra Energy Seabrook's Evaluation of the Proposed Change

Subject: License Amendment Request 10-01, Operations Manager Qualification Requirements

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
- 3.0 TECHNICAL EVALUATION
- 4.0 REGULATORY EVALUATION
 - 4.1 Applicable Regulatory Requirements/Criteria
 - 4.2 Significant Hazards Consideration
 - 4.3 Conclusion
- 5.0 ENVIRONMENTAL CONSIDERATION
- 6.0 REFERENCES

Attachment – Markup of Technical Specifications

1.0 SUMMARY DESCRIPTION

This license amendment request (LAR) proposes a change to Technical Specification (TS) 6.2.2.f. regarding qualification of the Operations Manager. The TS currently requires that the Operations Manager shall have held a senior reactor operator license for Seabrook Station prior to assuming the Operations Manager position. As an alternative to this requirement, the proposed change adds a provision that the Operations Manager has been certified to have knowledge equivalent to that of a senior operator.

2.0 DETAILED DESCRIPTION

Below is the proposed change to TS 6.2.2.f.

- f. ~~The Operations Manager shall have held a Senior Reactor Operator license for Seabrook Station prior to assuming the Operations Manager position. meet one of the following:~~
- 1) *Hold a senior operator license,*
 - 2) *Have held a senior operator license on a similar unit (PWR), or*
 - 3) *Have been certified for equivalent senior operator knowledge.*

3.0 TECHNICAL EVALUATION

Background

The Operations Manager is responsible for the safety and operation of Seabrook Station's equipment in accordance with written and approved station procedures, and he supervises the Assistant Operations Manager. The Assistant Operations Manager directs the activities of the Shift Managers (NRC licensed senior operators).

The current requirement for the Operations Manager to have held a Senior Reactor Operator license for Seabrook Station prior to assuming the Operations Manager position was added to the TS by Amendment 20, issued on April 26, 1993. Previously, the TS required that both the Operations Manager and the Assistant Operations Manager hold senior operator licenses.

Seabrook Station UFSAR, section 1.8, discusses that the Seabrook personnel selection and training program meets the requirements of Regulatory Guide 1.8 (revision 2, April 1987)), except that ANSI/ANS 3.1-1978 will be used as the standard rather than ANSI N18.1-1971 with exceptions as discussed in the UFSAR. The UFSAR states that the requirement in ANSI/ANS-1978, section 4.2.2 for the Operations Manager to hold a senior operator license is modified to require this individual to hold or have held a senior

operator license at Seabrook Station prior to assuming the Operations Manager position, which is consistent with ANS 3.1-1987.

Proposed Change

As an alternative to holding or having held a senior operator license, the proposed change would add a provision that the Operations Manager has been certified to have knowledge equivalent to that of a senior operator. This provision is similar to Special Requirement d(3) for the Operations Manager in ANSI/ANS 3.1-1987 [Reference 1]: "Have been certified at an appropriate simulator for equivalent senior operator knowledge," and is consistent with section 4.2.2 (Operations Manager) of ANSI/ANS 3.1-1993 [Reference 2], which is endorsed by Regulatory Guide 1.8 [Reference 3]: "Have been certified for equivalent senior operator knowledge."

An individual considered certified by NextEra to have equivalent senior operator knowledge must have participated in a training program that contains all the elements (fundamentals, systems, on-the job training, and simulator) required for an individual to apply for a senior operator license. By participating in such a program, the individual has received the same training provided to candidates applying for a senior operator license and has demonstrated the required senior operator knowledge.

As described in UFSAR section 13.1, the Operations Manager reports to the Plant General Manager and is responsible for the safety and operation of the unit's equipment in accordance with written and approved station procedures. He does not perform any functions under 10 CFR 50.54 for which a senior operator license is required. The Operations Manager supervises the Assistant Operations Manager, who in turn directs the activities of the Shift Managers (licensed senior operators). Section 4.2.2 of ANSI/ANS 3.1-1993 stipulates that if the Operations Manager does not hold a senior operator license, then the Operations Middle Manager shall hold a senior operator license. The Assistant Operations Manager is equivalent to the Operations Middle Manager, and Seabrook TS 6.2.2.g. requires the Assistant Operations Manager to hold a senior operator license.

Precedent

The proposed change is similar to one approved in Amendments 192 and 175 for Salem Nuclear Generating Station, Units 1 and 2, in March 1997 [Reference 4]. In a submittal made in January, 1996, Salem proposed a change that either the Operations Manager or Assistant Operations Manager holds a senior operator license. If the Assistant Operations Manager holds the senior operator license, the minimum qualification for the Operations Manager would be to "have been certified at an appropriate simulator for equivalent senior operator knowledge." In its Safety Evaluation related to the amendments, the NRC concluded "Under conditions where the Assistant Operations Manager holds an SRO license, the minimum qualifications for the Operations Manager, having "...been

certified at an appropriate simulator for equivalent senior operator knowledge,” is in accordance with ANSI/ANS-3.1-1987, and is acceptable.”

Conclusion

The proposed change continues to ensure that knowledgeable, operationally competent individuals are assigned to the Operations Manager position. For those instances in which an Operations Manager did not previously hold a senior operator license, the proposed change would require that the individual must have been certified to have equivalent senior operator knowledge. The proposed change is consistent with ANSI/ANS 3.1-1993, which has been endorsed by Regulatory Guide 1.8 as providing criteria acceptable to the NRC for selection, qualification, and training of nuclear power plant personnel.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.36, Technical Specifications, requires that the TS include administrative controls, which are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

10 CFR 50.54 requires that individuals responsible for directing the licensed activities of licensed operators shall be licensed as senior operators.

10 CFR 55.3 requires that a person must be authorized by a license issued by the Commission to perform the function of an operator or a senior operator.

The proposed TS change is administrative in nature and is consistent with the above regulatory requirements. As an alternative to having held a senior operator license, the change adds a provision that the Operations Manager has been certified to have knowledge equivalent to that of a senior operator. The Assistant Operations Manager, required by TS 6.2.2.g to hold a senior operator license, directs the activities of the licensed operators consistent with 10 CFR 50.54. The change is considered administrative because it makes no physical changes to the facility and no change in operation of the facility. Therefore, the proposed license amendment does not adversely affect nuclear safety or safe plant operations.

4.2 Significant Hazards Consideration

No Significant Hazards Consideration

In accordance with 10 CFR 50.92, NextEra Energy Seabrook has concluded that the proposed change does not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed changes do not involve a SHC is as follows:

1. *The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.*

This request is for an administrative change only. The proposed change does not impact the physical configuration or function of plant structures, systems, or components (SSCs) or the manner in which SSCs are operated, maintained, modified, tested, or inspected. No actual facility equipment or accident analyses will be affected by the proposed changes. Therefore, this request has no impact on the probability or consequences of an accident previously evaluated.

2. *The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.*

This request is for an administrative change. The proposed change does not alter the plant configuration, require new plant equipment to be installed, alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. Therefore, this request does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *The proposed changes do not involve a significant reduction in the margin of safety.*

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. This request is for administrative changes only. No actual plant equipment or accident analyses will be affected by the proposed changes. Additionally, the proposed changes will not relax any criteria used to establish safety limits, will not relax any safety system settings, and will not relax the bases for any limiting conditions for operation. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside the design basis. The proposed change does not adversely affect systems that respond to safely shutdown the plant

and to maintain the plant in a safe shutdown condition. Therefore, these proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, NextEra Energy Seabrook, LLC, concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(b), and, accordingly, a finding of “no significant hazards consideration” is justified.

4.3 Conclusions

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission’s regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

In accordance with 10 CFR 51.21, following is an environmental assessment for the proposed change.

Identification of the Proposed Action:

The Seabrook Technical Specifications currently require that the Operations Manager shall have held a senior reactor operator license for Seabrook Station prior to assuming the Operations Manager position. The proposed change would require that the individual in the Operations Manager position meet one of the following: (1) hold a senior operator license, (2) have held a senior operator license for a similar unit, or (3) have been certified for equivalent senior operator knowledge

The Need for the Proposed Action:

The proposed action will support assigning the most suitable, qualified individual to the Operations Manager position by providing flexibility in demonstrating the necessary operational competence for the position.

Environmental Impacts of the Proposed Action:

The proposed action involves an administrative change to the Technical Specifications. The proposed action will not significantly increase the probability or consequences of

accidents. No changes are being made in the types of effluents that may be released offsite, and there is no significant increase in the amount of any effluent released offsite. The proposed action results in no significant increase in individual or cumulative occupational radiation exposure. Therefore, there are no significant radiological environmental impacts associated with the proposed action.

With regard to potential non-radiological impacts, the proposed action does not have a potential to affect any historic sites. It does not affect non-radiological plant effluents and has no other environmental impact. Therefore, there are no significant non-radiological environmental impacts associated with the proposed action.

Accordingly, NextEra concludes that there are no significant environmental impacts associated with the proposed action.

Environmental Impacts of the Alternatives to the Proposed Action:

As an alternative to the proposed action, the NRC could consider denial of the proposed action (i.e., the “no-action” alternative). Denial of the exemption request would result in no change in current environmental impacts. The environmental impacts of the proposed action and the alternative action are similar.

Alternative Use of Resources:

The action does not involve the use of any different resources than those previously considered in the Final Environmental Statement for the Seabrook Station, Unit No. 1, NUREG-0895, dated December 1982.

6.0 REFERENCES

1. ANSI/ANS-3.1-1987, Selection, Qualification, and Training of Personnel for Nuclear Power Plants
2. ANSI/ANS-3.1-1993, Selection, Qualification, and Training of Personnel for Nuclear Power Plants
3. Regulatory Guide 1.8, Qualification and Training of Personnel for Nuclear Power Plants, Revision 3, May 2000
4. Issuance of Amendments 192 and 175 in NRC letter from L. N. Olshan to L. R. Eliason , “Salem Nuclear Generating Station, Unit Nos. 1 and 2 (TAC Nos M94448 and 94449),” March 1997

Attachment

Mark-up of the Technical Specifications (TS)

Refer to the attached markup of the TS showing the proposed changes. The attached markups reflect the currently issued version of the TS and Facility Operating License. At the time of submittal, the Facility Operating License was revised through Amendment No. 123.

Listed below are the license amendment requests that are awaiting NRC approval and may impact the currently issued version of the Facility Operating License affected by this LAR.

LAR	Title	NextEra Energy Seabrook Letter	Date Submitted
LAR 09-03	Revision to Technical Specification 6.7.6.k, "Steam Generator (SG) Program," for Permanent Alternate Repair Criteria (H*)	SBK-L-09118	05/28/2009
LAR 09-04	Amendment to the Facility Operating License and Submittal of the Seabrook Station Cyber Security Plan	SBK-L-09218	11/19/2009

The following TS pages are included in the attached markup:

Technical Specification	Title	Page
TS 6.2.2	Station Staff	6-2

INSERT

f. The Operations Manager shall meet one of the following:

1. Hold a senior operator license,
 2. Have held a senior operator license on a similar unit (PWR), or
 3. Have been certified for equivalent senior operator knowledge.
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6.2.2 STATION STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation; and
- e. Deleted
- f. ~~The Operations Manager shall have held a Senior Reactor Operator license for Seabrook Station prior to assuming the Operations Manager position.~~
- g. The Assistant Operations Manager shall hold a senior reactor operator license.

(1)

INSERT

*The Health Physics Technician may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.