

From: Miller, Ed
Sent: Tuesday, August 09, 2011 3:47 PM
To: OKeefe, Michael
Subject: Draft RAI for LAR 10-02

Mike,

Below is the draft RAI for LAR 10-02. The draft question is being provided to you to ensure that the question is understandable, the regulatory basis is clear, and to determine if the information has been previously docketed. Additionally, review of the draft RAI would allow you to evaluate and agree upon a schedule to respond to the RAI. The draft RAI does not represent an NRC staff position. Please let me know when you have had a chance to review the draft RAI and are ready to discuss. Thanks.

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DRAFT RAI

By letter dated May 14, 2010 (Agencywide Document Access and Management System (ADAMS) Accession No. ML101390041), as supplemented by letter dated August 24, 2010 (ADAMS Accession No. ML102380100), NextEra Energy Seabrook, LLC (NextEra or the licensee) submitted license amendment request (LAR) 10-02. LAR 10-02 proposed modifying Technical Specification (TS) 3.6.5.1 to add an action statement allowing 24 hours of operation with both trains of the containment enclosure building air cleanup system (CEEACS) inoperable due to an inoperable containment enclosure building. This change would align TS 3.6.5.1 with TS 3.6.5.2, which currently allows operation for 24 hours if the containment enclosure building is inoperable. To complete its review, the Nuclear Regulatory Commission staff needs the following information:

The supplement dated August 24, 2010, stated: “[t]he proposed changes are similar to provisions that exist in the TSs in NUREG-1431[, “Standard Technical Specifications – Westinghouse Plants,” Revision 3,] for certain emergency air cleanup systems.”

The Seabrook TSs are of a different format and contain different content compared to NUREG-1431. Seabrook TSs contain the concept and defined term “CONTAINMENT ENCLOSURE BUILDING INTEGRITY;” NUGEG-1431 does not contain this term and treats containment differently. NUREG-1431 contains limiting condition for operation (LCO) 3.0.6, which provides allowances for support and supported system inoperability. The Seabrook TSs do not contain a similar LCO.

Proposed Action b for Seabrook TS 3.6.5.1 would provide a relaxation from the current way that NextEra applies the TS requirements. The supplement dated August 24, 2010, stated that the CEEACS at Seabrook performs a similar function to systems in Standard TS (STS) 3.7.12, “Emergency Core Cooling System Pump Room Exhaust Air Cleanup System,” and 3.7.14, “Penetration Room Exhaust Air Cleanup System.” The supplement stated that the proposed change would be similar to Condition B for both STS 3.7.12 and 3.7.14, allowing operation for 24 hours when both air-handling trains are inoperable due to an inoperable boundary. Seabrook TS 3.6.5.1 does not contain surveillance requirements (SRs) similar to SR 3.7.12.4 and 3.7.14.4.

Given the differences in format and content between NUREG-1431 and Seabrook TS, please describe how the proposed TS change provides an equivalent level of safety compared to that found in NUREG-1431.