



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

June 11, 2012

Mr. Paul Freeman  
Site Vice President  
c/o Michael O'Keefe  
Seabrook Station  
NextEra Energy Seabrook, LLC  
P.O. Box 300  
Seabrook, NH 03874

**SUBJECT: SEABROOK STATION, UNIT 1 - REQUEST FOR ADDITIONAL INFORMATION REGARDING THE ADDITION OF ACTION STATEMENT TO LIMITING CONDITION FOR OPERATION 3.6.5.1, "CONTAINMENT ENCLOSURE EMERGENCY AIR CLEANUP SYSTEM" (TAC NO. ME3988)**

Dear Mr. Freeman:

By letter dated May 14, 2010,<sup>1</sup> as supplemented by letters dated August 24, 2010,<sup>2</sup> September 16, 2011,<sup>3</sup> and March 15, 2012,<sup>4</sup> NextEra Energy Seabrook, LLC (NextEra or the licensee) submitted license amendment request (LAR) 10-02 to revise the technical specifications (TSs) for Seabrook Station, Unit No. 1 (Seabrook). The proposed amendment would change TS Surveillance Requirement (SR) 4.6.5.1.d.4 so that it will demonstrate integrity of the containment enclosure building (CEB) rather than operability of the Containment Enclosure Emergency Air Cleanup System (CEEACS). The amendment relocates SR 4.6.5.1.d.4 with modifications to new SR 4.6.5.2.b. Additionally, the amendment makes some minor wording changes, deletes a definition, and removes a moot footnote.

The U.S. Nuclear Regulatory Commission (NRC) has determined that additional information is required to complete its review. The NRC staff's request for additional information (RAI) is contained in the enclosed RAI. A draft of these questions was previously sent to Mr. Gary Kilby of your staff with an opportunity to have a teleconference to ensure that the licensee understood the questions and their regulatory basis, as well as to verify that the information was not previously docketed. Conference calls were held on May 25, June 4, and June 7, 2012, and Mr. Kilby agreed that NextEra Energy Seabrook, LLC would respond to the RAI within 30 days of the date of this letter. Please note that if you do not respond to the RAI within 30 days, the NRC staff may reject your request for relief under the provisions of Title 10 of the *Code of Federal Regulations*, Section 2.108, "Denial of application for failure to supply information."

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML101390041

<sup>2</sup> ADAMS Accession No. ML102380100

<sup>3</sup> ADAMS Accession No. ML11266A041

<sup>4</sup> ADAMS Accession No. ML120790307

P. Freeman

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If you have questions, you can contact me at 301-415-3100 and/or [John.Lamb@nrc.gov](mailto:John.Lamb@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Lamb". The signature is fluid and cursive, with the first name "John" being the most prominent.

John G. Lamb, Senior Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

THE ADDITION OF ACTION STATEMENT TO LIMITING CONDITION FOR OPERATION

3.6.5.1, "CONTAINMENT ENCLOSURE EMERGENCY AIR CLEANUP SYSTEM"

NEXTERA ENERGY SEABROOK, LLC

SEABROOK STATION, UNIT 1

DOCKET NUMBER 50-443

1.0 SCOPE

By letter dated May 14, 2010,<sup>1</sup> as supplemented by letters dated August 24, 2010,<sup>2</sup> September 16, 2011,<sup>3</sup> and March 15, 2012,<sup>4</sup> NextEra Energy Seabrook, LLC (NextEra or the licensee) submitted license amendment request (LAR) LAR 10-02 to revise the technical specifications (TSs) for Seabrook Station, Unit No. 1 (Seabrook). The proposed amendment would change TS Surveillance Requirement (SR) 4.6.5.1.d.4 so that it will demonstrate integrity of the containment enclosure building (CEB) rather than operability of the Containment Enclosure Emergency Air Cleanup System (CEEACS). The amendment relocates SR 4.6.5.1.d.4 with modifications to new SR 4.6.5.2.b. Additionally, the amendment makes some minor wording changes, deletes a definition, and removes a moot footnote.

The U.S. Nuclear Regulatory Commission (NRC) has determined that additional information is required to complete its review. The NRC staff's request for additional information (RAI) is contained below.

2.0 BACKGROUND

Under Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.36(c)(2), *Limiting conditions for operation*. Subsection (i) requires: "Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met."

Under 10 CFR 50.36(3) *Surveillance requirements*, "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

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### 3.0 REQUEST FOR ADDITIONAL INFORMATION

Seabrook CEB Integrity TS 3.6.5.2 limiting condition for operation requires that CEB integrity shall be maintained during Modes 1, 2, 3 and 4. TS 3.6.5.2 includes an Action requirement to restore CEB integrity within 24 hours or be in Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours when CEB integrity is not met for any reason.

SR 4.6.5.2 requires that "Containment enclosure building integrity shall be demonstrated: a. At least once per 31 days by verifying that the door in each access opening is closed, except when the access opening is being used for normal transit entry or exit." Thus, the proposed SR 4.6.5.2 would not require entry into the TS 3.6.5.2 Action for opening access doors for normal transit entry or exit.

While the Seabrook action requirements to restore CEB integrity within 24 hours of discovery of not having integrity for any reason (emphasis added) is consistent with the NRC staff position for enclosure building integrity not being met per NUREG-1431, Revision 4, *Standard Technical Specifications for Westinghouse Plants*, the comparison does not apply because the Seabrook access opening design departs from the design assumed by Standard Technical Specifications (STS). Seabrook CEB access openings are designed with a single door at each entry point whereas the STS design presumes an airlock with two doors at each entry point. Routine preventative maintenance (PM) on the Seabrook CEB doors, therefore, represents a loss of safety function, whereas, in the design modeled in the STS, there is no loss of safety function for the same maintenance activity. The NRC staff concern is that 24 hour allowance to restore CEB integrity (for any reason) is not an appropriate limit for operating Seabrook, because Seabrook TS 3.6.5.2 Actions do not address the additional CEB loss of safety function due to PM on door seals and door hardware. Routine maintenance on access opening doors is accomplished for the STS design without rendering CEB integrity not being met. Please revise Seabrook TS 3.6.5.2 Actions to provide appropriate limits that address the NRC staff concern.

P. Freeman

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If you have questions, you can contact me at 301-415-3100 and/or [John.Lamb@nrc.gov](mailto:John.Lamb@nrc.gov).

Sincerely,  
/RA/

John G. Lamb, Senior Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-443

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Request for Additional Information

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**ADAMS ACCESSION NO.: ML12156A289** \*via email

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| NAME   | JLamb     | ABaxter * | CSchulten* | MKhanna    |
| DATE   | 6/ 8/2012 | 6/8 /2012 | 6/ 08/2012 | 6/ 11/2012 |

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