



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

September 10, 2012

Mr. Kevin Walsh
Site Vice President
NextEra Energy Seabrook, LLC
P.O. Box 300
Seabrook, NH 03874

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
SEABROOK STATION, LICENSE RENEWAL APPLICATION – SET 18
(OPERATING EXPERIENCE)

Dear Mr. Walsh:

By letter dated May 25, 2010, NextEra Energy Seabrook, LLC, submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54) to renew Operating License NPF-86 for Seabrook Station, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with Richard Cliche, of your staff, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me by telephone at 301-415-3897 or by e-mail at Arthur.Cunanan@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Arthur Cunanan".

Arthur Cunanan, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure:
As stated

cc w/encl: Listserv

SEABROOK STATION
LICENSE RENEWAL APPLICATION
REQUESTS FOR ADDITIONAL INFORMATION SET 18 (OPERATING EXPERIENCE)

RAI B.1.4-4

Background

By letter dated December 12, 2011, the U.S. Nuclear Regulatory Commission (NRC or the staff) issued request for additional information (RAI) B.1.4-2 requesting specific information on how NextEra Energy Seabrook, LLC (the applicant)'s operating experience review activities address issues related to aging. In this letter, the staff also issued RAI B.1.4-3 requesting the applicant provide additional details in the updated final safety analysis report (UFSAR) supplement consistent with the response to RAI B.1.4-2. By letter dated January 20, 2012, the applicant responded to RAI B.1.4-2 with additional information regarding its operating experience program. The applicant also provided an update to the UFSAR supplement in response to RAI B.1.4-3. Subsequently, on March 16, 2012, the NRC issued Final License Renewal-Interim Staff Guidance (LR-ISG)-2011-05, "Ongoing Review of Operating Experience," to clarify the staff's position that license renewal aging management programs (AMPs) should be informed, and enhanced when necessary, based on the ongoing review of both plant-specific and industry operating experience.

Issue

Based on its review of the applicant's responses, the staff determined that additional information is needed in order for the staff to determine whether the applicant's operating experience review activities will be consistent with LR-ISG-2011-05.

- a) Itemized Change No. 7 in LR-ISG-2011-05, Appendix A, states that the entries associated with the aging-specific identification code in the corrective action program (CAP) should be periodically reviewed to determine whether trending is necessary and that any adverse trend should be entered into the CAP for evaluation. In its response to RAI B.1.4-2, the applicant stated that, as an enhancement, it will develop a trend code to track and facilitate trending of age-related degradation issues and it also stated that current procedures address CAP performance monitoring and trending. However, it is not clear how these current procedures provide for the periodic review of items associated with the aging-specific identification code or how adverse trends associated with this code will be identified and whether any adverse trends will be entered into the CAP.
- b) Itemized Change No. 7 in LR-ISG-2011-05, Appendix A, states that training on age-related degradation and aging management should be provided to plant personnel and that this training should occur on a periodic basis and include provisions to accommodate personnel turnover. In its response to RAI B.1.4-2, the applicant stated that, as an enhancement, it will clarify the type and periodicity of training and accounting of personnel turnover for those personnel responsible for screening, assigning, evaluating, and submitting aging related operating experience. In response to

ENCLOSURE

RAI B.1.4-3, the applicant also revised the UFSAR supplement to include a description of the training; however, this description does not state that the training is periodic or that it includes provisions to accommodate the turnover of plant personnel.

- c) Itemized Change No. 7 in LR-ISG-2011-05, Appendix A, states that guidelines should be established for reporting plant-specific operating experience on age-related degradation and aging management to the industry. In its response to RAI B.1.4-2, the applicant described its criteria for reporting plant-specific operating experience to the industry; however, the staff determined that these criteria are general and do not specifically address aging. In addition, the staff found that the UFSAR supplement, as revised by letter dated January 20, 2012, does not address reporting of aging-related operating experience to the industry.
- d) Itemized Change No. 7 in LR-ISG-2011-05, Appendix A, states that any enhancements to the existing operating experience review activities should be put in place no later than the date the renewed operating license is issued. In response to RAI B.1.4-2, the applicant identified three enhancements, which include updating the operating experience procedure, developing an aging trend code, and training. The applicant stated that these actions will be completed as part of the renewed license implementation; however, it is not clear whether they will be completed by the date when the renewed operating license is issued.

Request

- a) Describe how entries in the CAP that are associated with the age-related degradation trend code will be periodically reviewed to determine whether trending is necessary and indicate whether any adverse trends will be entered into the CAP for evaluation.
- b) Revise the UFSAR supplement, consistent with the response to RAI B.1.4-2, to indicate that the training of plant personnel is periodic and accounts for personnel turnover.
- c) Describe guidelines that specifically address reporting of operating experience on age-related degradation and aging management to the industry. In addition, revise the UFSAR supplement to address reporting of plant-specific operating experience related to aging to the industry.
- d) Clarify whether the enhancements described in response to RAI B.1.4-2 will be implemented by the date when the renewed operating license is issued.

This request is for closure of Open Item OI B.1.4-2 in the safety evaluation report with open items.

September 10, 2012

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Sincerely,

/RA/ S. Cuadrado de Jesús for

Arthur Cunanan, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure:
As stated

cc w/encl: Listserv

DISTRIBUTION: See next page

ADAMS Accession No. ML12242A194

*concurrence via email

OFFICE	PM:RPB1:DLR	LA:RPB2:DLR*	BC:RPB1:DLR	PM: RPB1:DLR
NAME	ACunanan (PMilano for)	IKing	DMorey	ACunanan (SCuadrado for)
DATE	9/6/12	8/31/12	9/10/12	9/10/12

OFFICIAL RECORD COPY

Letter to Kevin Walsh from Arthur Cunanan dated September 10, 2012

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