

September 21, 2012

Administrative Judge
Paul S. Ryerson, Chair
Atomic Safety and Licensing Board
Mail Stop: T-3F23
Washington, DC 20555-0001

Administrative Judge
Dr. Michael F. Kennedy
Atomic Safety and Licensing Board
Mail Stop: T-3F23
Washington, DC 20555-0001

Administrative Judge
Dr. Richard E. Wardwell
Atomic Safety and Licensing Board
Mail Stop: T-3F23
Washington, DC 20555-0001

In the Matter of
NEXTERA ENERGY SEABROOK, LLC
(Seabrook Station, Unit 1)
Docket No. 50-443-LR

RE: Corrections and Supplement to Friends of the Coast and New England Coalition
Petition for leave to File a New Contention Regarding NextEra Energy Seabrook
License Renewal Application Structures Monitoring Program Supplement-Alkali-Silica
Reaction (“ASR”) Monitoring

Dear Administrative Judges:

Friends of the Coast and New England Coalition (“Friends/NEC”), intervenors in the above captioned matter hereby provide a Supplement and Corrections to our August 27, 2012 petition seeking leave to file a new contention regarding the NextEra Energy Seabrook License Renewal Application Structures Monitoring Program Supplement-Alkali-Silica Reaction (“ASR”) Monitoring.

On September 14, 2012, the NRC published plans for a deviation in the Reactor Oversight Process (ROP) to seek assurance that NextEra has adequately assessed the extent and progress of ASR-related concrete degradation of safety-related structures at Seabrook Station and that NextEra will develop a concrete structures inspection and monitoring program that will retain operability of affected concrete structures through the term of Seabrook’s current license to 2032 [never mind the proposed period of extend operation; through 2052].

On September 17, 2012, NRC published “Requests for Additional Information, Set 19,” which concerns inadequacies in the NextEra’s responses to the NRC’s May 16, 2012, “Confirmatory Action Letter, Seabrook Station, Unit 1 -Information Related to Concrete Degradation Issues,” dealing with management of ASR in affected Seabrook Station structures.”

And, on September 13, 2012, C-10 Research Foundation and Union of Concerned Scientists (UCS) Advised NRC by letter of their profound concerns with inadequacies in the approach to ASR at Seabrook Station.

Friends/NEC believes that the C-10/UCS Letter and following documents:

- ML12242A370, “Request for Deviation from the Reactor Oversight Process Action Matrix to Provide Increased Oversight of the Alkali-Silica Reaction Issue at Seabrook” (Added To ADAMS September 14, 2012)

and

- ML121250588 “Seabrook Alkali-Silica Reaction Issue Technical Team Charter” (Added To ADAMS September 14, 2012)

and ;

- ML12250A707, “Requests for Additional Information for the Review of the Seabrook Station, License Renewal Application -Set 19” (Added to ADAMS September 17, 2012,

constitute new information, material to a decision on admittance of the proposed new contention; thus information which the parties have an obligation to provide to the Atomic Safety and Licensing Board (“Board”) in a prompt and timely fashion. Also, Friends/NEC offers that these documents, not available when the petition was filed, support and provide additional basis for the proposed contention:

The NextEra Energy Seabrook License Renewal Application, as amended by the Structures Monitoring Program Supplement-Alkali-Silica Reaction (“ASR”) Monitoring, (dated May 16, 2012 and provided to Friends/NEC in NRC Staff Disclosures, July 6, 2012) fails to demonstrate as required by Part 54, “Requirements for Renewal of Operating Licenses for Nuclear Power Plants,” Section 21(a)(3), of Title 10 of the *Code of Federal Regulations* (10 CFR 54.21(a)(3)), that the effects of aging on structures and components subject to an aging management review (AMR) are adequately managed so that the intended function(s) will be maintained consistent with the current licensing basis (CLB) for the period of extended operation.

Therefore, Friends/NEC is providing the documents as a “supplement” containing language that simply draws a nexus between the petition and NRC’s expressed misgivings regarding NextEra’s plans for managing determination and preservation of operability of ASR-affected structures.

In preparing this supplemental filing, Friends/NEC reviewed the Petition itself and perceived a number of typographical and scrivener’s errors, which for the sake of the record and the convenience of readers have now been corrected and are now being forwarded in a corrected version , together with an errata and corrections index so that readers need not hunt for changes.

Friends/NEC regrets any inconvenience or concern for the Board and the parties resulting from either the supplement or the corrected petition. The deadline for filing answers to the petition looms within a few days so parties preparing answers may feel burdened by the timing of this filing. Friends/NEC respectfully offers that if the parties need extra time to fold an answer to this filing into their answer to the petition, or to answer this filing separately, it should be accorded; and the Board’s consideration and decision regarding the proposed new Friends/NEC contention delayed as appropriate.

Sincerely,

Signed (electronically) by

Raymond Shadis
Friends of the Coast/
New England Coalition
Post Office Box 98
Edgecomb, Maine 04556
Date of signature: September 21, 2012