NEXTera® ENERGY
SEABROOK

July 13, 2015

SBK-L-15093
10 CFR 50.90
Docket No. 50-443
Facility Operating License No. NPF-86

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

Seabrook Station

License Amendment Request (LAR) 15-01
Application to Add a Note to Technical Specification TS 4.4.1.3.4

References

1. NextEra Energy Seabrook, LLC License Amendment Request (LAR) 14-01, Application to Revise Technical Specifications to Adopt Technical Specifications Task Force (TSTF) Traveler -523, "Generic Letter 2008-01, Managing Gas Accumulation," Using the Consolidated Line Item Improvement Process, dated June 24, 2014 (ML14177A503)

2. NextEra Energy Seabrook, LLC letter, Supplement to NextEra Energy Seabrook, LLC's LAR 13-05, LAR 14-01, LAR 14-02 and LAR 14-03 in Response to Issuance of Amendment 141, Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to the Seabrook Surveillance Frequency Control Program (SFCP), dated December 11, 2014 (ML14349A646)

3. NRC letter, "Issuance of Amendment Regarding Technical Specifications Task Force (TSTF) Traveler-523, "Generic Letter 2008-01, Managing Gas Accumulation" Using the Consolidated Line Item Improvement Process" (TAC NO. MF4307), dated February 6, 2015 (ML14345A288)

Pursuant to 10 CFR 50.90, NextEra Energy Seabrook, LLC (NextEra) is submitting a request for amendment to the Technical Specifications (TS) for Seabrook Station (Seabrook), Unit 1.

In Reference 1, NextEra submitted License Amendment Request (LAR) 14-01 to modify TS requirements to address NRC Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," as described in TSTF-523, Revision 2 "Generic Letter 2008-01, Managing Gas Accumulation."

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In Reference 2, NextEra submitted revised, marked-up TS pages for LAR 13-05, LAR 14-01, and LAR 14-02 to reflect changes to those pages made by License Amendment (LA) 141. The revised, marked-up pages for LAR 14-01 inadvertently omitted a note from Surveillance Requirement (SR) 4.4.1.3.4 which was being added as part of LAR 14-01.

In Reference 3, the NRC issued LA 144, which did not include the note related to SR 4.4.1.3.4.

Attachment 1 provides a description and assessment of the proposed change. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides existing TS Bases pages marked up to show the proposed change to the bases. The change to the existing TS Bases, consistent with the technical and regulatory analyses, will be implemented under the Technical Specification Bases Control Program. It is provided in Attachment 3 for information only. New TS pages with the proposed change incorporated will be provided when requested by the NRC Project Manager.

Approval of the proposed amendment is requested by September 30, 2015. Once approved, the amendment will be implemented within 30 days.

The Station Operation Review Committee has reviewed this LAR. A copy of this LAR has been forwarded to the New Hampshire State Liaison Officer pursuant to 10 CFR 50.91(b).

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

If you have any questions or require additional information, please contact Mr. Michael Ossing at 603-773-7512.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 13, 2015.

Sincerely,

NextEra Energy Seabrook, LLC

R. Dodds HP

Ralph A. Dodds, III
Plant General Manager

Attachments: 1. Description and Assessment
2. Proposed TS Change (marked-up page)
3. Proposed TS Bases Change (marked-up page) – For information only

cc: USNRC Regional Administrator, Region I
J. G. Lamb, USNRC Project Manager, Project Directorate I-2
USNRC Senior Resident Inspector, Seabrook Station

Mr. Perry Plummer, 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

**License Amendment Request (LAR) 15-01,**
**Application to Add a Note to Technical Specification TS 4.4.1.3.4**

**Attachment 1**
**Seabrook Station**
**Description and Assessment**

1.0 SUMMARY DESCRIPTION

2.0 DETAILED DESCRIPTION

3.0 TECHNICAL EVALUATION

4.0 REGULATORY SAFETY ANALYSIS

- 4.1 Applicable Regulatory Requirements/Criteria
- 4.2 No Significant Hazards Consideration Determination
- 4.2 Conclusions

5.0 ENVIRONMENTAL EVALUATION

6.0 REFERENCES

**ATTACHMENT 1**
**DESCRIPTION AND ASSESSMENT**

## 1.0 SUMMARY DESCRIPTION

The proposed change adds the following Note to Surveillance Requirement (SR) 4.4.1.3.4 which requires verification that Residual Heat Removal (RHR) loop locations susceptible to gas accumulation are sufficiently filled with water in accordance with the Surveillance Frequency Control Program:

*"* Not required to be performed until12 hours after entering MODE 4."*

## 2.0 DETAILED DESCRIPTION

The proposed change adds a Note to SR 4.4.1.3.4 which requires verification that RHR loop locations susceptible to gas accumulation are sufficiently filled with water in accordance with the Surveillance Frequency Control Program.

In Reference 1, NextEra Energy Seabrook, LLC (NextEra) submitted License Amendment Request (LAR) 14-01 to modify Technical Specification (TS) requirements to address NRC Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," as described in TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

In Reference 2, NextEra submitted revised, marked-up TS pages for LAR 13-05, LAR 14-01, and LAR 14-02 to reflect changes to those pages made by License Amendment (LA) 141 which implemented the Surveillance Frequency Control Program. The revised marked-up pages for LAR 14-01 inadvertently omitted a note from SR 4.4.1.3.4, which was added to the TS as part of LA 144 (Reference 3).

The proposed change adds the note back in to SR 4.4.1.3.4.

## 3.0 TECHNICAL EVALUATION

SR 4.4.1.3.4 verifies RHR loop locations susceptible to gas accumulation are sufficiently filled with water in accordance with the Surveillance Frequency Control Program. The Note is added to the gas accumulation SR for the RHR system Limiting Condition for Operations (LCOs) that are initially applicable during a plant shutdown. The Note states that the SR does not have to be performed until 12 hours after entering the Applicability of the LCO (MODE 4). Surveillances are normally performed prior to entering the Applicability. During a rapid shutdown, there may be insufficient time to verify all susceptible locations in the RHR System before entering the Applicability. The Note provides a limited time to perform the Surveillance after entering the Applicability of the LCO; however, under the Improved Standard Technical Specifications

(ISTS) usage rules, (ISTS Section 1.4), the requirement to manage gas accumulation is not affected. Licensees must have confidence that the SR can be met or the LCO must be declared not met. The proposed change is consistent with TSTF-523 (Reference 4), Section 3.1.

## 4.0 REGULATORY SAFETY ANALYSIS

### 4.1 Applicable Regulatory Requirements/Criteria

The following regulatory requirements/criteria are applicable:

- 10 CFR 50.36, "Technical Specifications," establishes the requirements for the items that must be included in the TS. Paragraph 50.36(c)(3), states, "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."
- General Design Criteria (GDC) 1, 34, 35, 36, 37, 38, 39, and 40 in 10 CFR Part 50, Appendix A, and the Quality Assurance (QA) Criteria III, V, XI, XVI, and XVII in 10 CFR 50, Appendix B, address aspects of ensuring that systems are not impaired by entrained gas.

### 4.2 No Significant Hazards Consideration Determination

The proposed change adds a Note to SR 4.4.1.3.4 that states that the SR does not have to be performed until 12 hours after entering the Applicability of the LCO (MODE 4). Surveillances are normally performed prior to entering the Applicability. During a rapid shutdown, there may be insufficient time to verify all susceptible locations in the RHR System before entering the Applicability. SR 4.4.1.3.4 verifies RHR loop locations susceptible to gas accumulation are sufficiently filled with water in accordance with the Surveillance Frequency Control Program.

NextEra has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the Proposed Change Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated?

   Response: No

   SR 4.4.1.3.4 verifies RHR loop locations susceptible to gas accumulation are sufficiently filled with water in accordance with the Surveillance Frequency Control Program. The proposed change adds a note to allow SR 4.4.1.3.4 to be performed 12 hours after entering the Mode of Applicability. Gas accumulation in the subject system is not an initiator of any accident previously evaluated. As a result, the probability of any accident previously evaluated is not significantly increased. The proposed note does not change SR 4.4.1.3.4

which ensures that the subject system continues to be capable of performing its assumed safety function and is not rendered inoperable due to gas accumulation.

Thus, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the Proposed Change Create the Possibility of a New or Different Kind of Accident from any Accident Previously Evaluated?

Response: No

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. In addition, the proposed change does not impose any new or different requirements that could initiate an accident. The proposed change does not alter assumptions made in the safety analysis and is consistent with the safety analysis assumptions.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the Proposed Change Involve a Significant Reduction in a Margin of Safety?

Response: No

The proposed change does not adversely affect any current plant safety margins or the reliability of the equipment assumed in the safety analysis. Therefore, there are no changes being made to any safety analysis assumptions, safety limits, or limiting safety system settings that would adversely affect plant safety as a result of the proposed change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, NextEra concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

### 4.3 Conclusions

In conclusion, 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 approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

## 5.0 ENVIRONMENTAL EVALUATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR Part 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

## 6.0 REFERENCES

1. NextEra Energy Seabrook, LLC License Amendment Request (LAR) 14-01, Application to Revise Technical Specifications to Adopt Technical Specifications Task Force (TSTF) Traveler -523, "Generic Letter 2008-01, Managing Gas Accumulation," Using the Consolidated Line Item Improvement Process, dated June 24, 2014 (ML14177A503)
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4. TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

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Attachment 2

**License Amendment Request (LAR) 15-01**
**Application to Add a Note to Technical Specification TS 4.4.1.3.4**

**Attachment 2**
**Seabrook Station**
**Technical Specifications Changes**
**Marked Up Pages**

**This coversheet plus 1 page**

SURVEILLANCE REQUIREMENTS

4.4.1.3.1 The required reactor coolant pump(s), if not in operation, shall be determined OPERABLE in accordance with the Surveillance Frequency Control Program by verifying correct breaker alignments and indicated power availability.

4.4.1.3.2 The required steam generator(s) shall be determined OPERABLE by verifying secondary-side water level to be greater than or equal to 14% in accordance with the Surveillance Frequency Control Program.

4.4.1.3.3 At least one reactor coolant or RHR loop shall be verified in operation and circulating reactor coolant in accordance with the Surveillance Frequency Control Program.

4.4.1.3.4 Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water in accordance with the Surveillance Frequency Control Program.*

ADD

* Not required to be performed until 12 hours after entering MODE 4.

**License Amendment Request (LAR) 15-01**
**Application to Add a Note to Technical Specification TS 4.4.1.3.4**

**Attachment 3**
**Seabrook Station**
**Technical Specifications Bases Changes**
**Marked Up Pages**
**For Information Only**

**This coversheet plus 1 page**
**Seabrook Station**

3/4.4.1 REACTOR COOLANT LOOPS AND COOLANT CIRCULATION (Continued)

RHR System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative subset of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, plant configuration, or personnel safety. For these locations, alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

In a rapid shutdown, there may be insufficient time to verify all susceptible locations prior to entering MODE 4.

Surveillance frequency in accordance with the Surveillance Frequency Control Program ensures locations are sufficiently filled with water by taking into consideration the gradual nature of gas accumulation in the RHR System piping and the procedural controls governing system operation.

The SURVEILLANCE Frequency is controlled under the Surveillance Frequency Control Program. The Surveillance Frequency may vary by location susceptible to gas accumulation.

This SR is modified by a NOTE that states the SR is not required to be performed until 12 hours after entering MODE 4.