NEXTera® ENERGY
SEABROOK

December 08, 2015

10 CFR 54

SBK-L-15204
Docket No. 50-443

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

Seabrook Station
Supplement 45 - Clarification of Response to Previous Submittal Related to Applicant/Licensee Action Items for the Inspection and Evaluation Guidelines for Pressurized Water Reactor Vessel Internals (MRP-227-A)

References:

1. NextEra Energy Seabrook, LLC letter SBK-L-10077, "Seabrook Station Application for Renewed Operating License," May 25, 2010. (Accession Number ML101590099)
2. NextEra Energy Seabrook, LLC letter SBK-L-15073, "Responses Applicant/Licensee Action Items for the Inspection and Evaluation Guidelines for Pressurized Water Reactor Vessel Internals (MRP-227-A)," May 26, 2015. (Accession Number ML15149A279)
3. NRC Request For Additional Information Related To The Review Of The Seabrook Station, Unit 1, License Renewal Application – Set 24 (TAC No. ME4028); August 28, 2015 (Accession Number ML15224A566)
4. NextEra Energy Seabrook, LLC letter SBK-L-15187; Supplement 43 - Responses to Request for Additional Information Related To the Review of the Seabrook Station, Unit 1 License Renewal Application – Set 24; October 9, 2015 (TAC No. ME4028)

In Reference 1, NextEra Energy Seabrook, LLC (NextEra Energy Seabrook) submitted an application for a renewed facility operating license for Seabrook Station Unit 1 in accordance with the Code of Federal Regulations, Title 10, Parts 50, 51, and 54.

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In Reference 2, NextEra Energy submitted a revised PWR Vessel Internals Program using the guidance provided in LR-ISG-2011-04 and MRP-227-A

In Reference 3, the NRC requested additional information in order to complete the review of NextEra Energy Seabrook's License Renewal Application (LRA). In Reference 4 NextEra submitted the requested information. A conference call was held with the staff on November 23, 2015 to clarify information previously provided.

The enclosure provides NextEra Energy Seabrook's response for the requested information. Provided in this Supplement are changes to a previously provided RAI response. To facilitate understanding, the changes are highlighted by strikethroughs for deleted text and bolded italics for inserted text. There are no new or revised regulatory commitments contained in this letter.

If there are any questions or additional information is needed, please contact Mr. Edward J. Carley, Engineering Supervisor - License Renewal, at (603) 773-7957.

If you have any questions regarding this correspondence, please contact Mr. Michael H. Ossing, Licensing Manager, at (603) 773-7512.

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

Executed on December 8 , 2015.

Sincerely,

NextEra Energy Seabrook, LLC

Dean Curtland
Site Vice President

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cc:

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Enclosure to SBK-L-15204

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Based on teleconference with the staff on November 23, 2015 NextEra is revising the previous response to SBK-L-15073 (Enclosure 1, Page 10-11): Applicant/License Action Item 3 as noted below.

NextEra Energy Seabrook Response to Applicant/Licensee Action Item 3

In 2006, the original Alloy X-750 Control Rod Guide Tube (CRGT) split pins were proactively replaced at NextEra Energy Seabrook with Westinghouse designed cold worked 316 stainless steel split pins to mitigate the concern for potential stress corrosion cracking inherent to Alloy X-750 material. As stated in MRP-232 (Material Reliability Program: Aging Management Strategies for Westinghouse and Combustion Engineering PWR Internals) Section 4.2.5.2, "*The most reliable management approach for eliminating concerns over guide tube support pin cracking is a proactive replacement with Type 316 CW SS support pins.*" MRP-232 Section 4.2.5.2 also states that "*It should be recognized that cracked guide tube support pins do not challenge safe plant operation. Even when pins are cracked, the design of the guide tube and the geometry of the pins maintain control rod functionality.*" The main issue with the failure of the CRGT split pins was determined to be potential damage from the loose parts. ***In addition, Section 4.4.3 of MRP-227 identifies which components are covered by Section XI and B-N-3. As split pins are not identified as covered by Section XI and B-N-3 in MRP-227, NextEra Seabrook does not consider split pins to be B-N-3 components.***

Cold-worked Type 316 SS split pins have been installed at other plants since 1997 and ***to NextEra's knowledge*** none of these plants have experienced any failures. ~~Since other plants have installed split pins since 1997 and Seabrook Station did not install them until 2006, it is reasonably assumed that the other plants will provide a leading indicator.~~ Additionally, there is no specific requirement from the industry working group and/or Westinghouse to inspect the cold worked 316 stainless steel CRGT split pins. Therefore, no inspections of split pins are currently planned. However, as part of the operating experience review process, the need for inspections will be reevaluated if ***the OEM or PWR Owners Group identifies*** failures of split pins of the same material ***has*** occurred in other PWRs. ***As previously demonstrated by NextEra Seabrook's replacement of the original Alloy X-750 Control Rod Guide Tube pins with Type 316 CW SS pins, NextEra Seabrook will evaluate Operating Experience received from the PWR Owners Group and OEM for applicability and corrective action.***