## NRR-PMDAPEm Resource

**From:** Poole, Justin
**Sent:** Monday, May 09, 2016 2:44 PM
**To:** Ossing, Michael
**Subject:** DRAFT - Request for Supplement RE: ILRT Extension
**Attachments:** DRAFT Supplement Request.docx

Mike,

By letter dated March 31, 2016, NextEra Energy Seabrook, LLC (NextEra) submitted a license amendment request for Seabrook Station, Unit No. 1. The proposed amendment would revise Technical Specification (TS) 6.15, Containment Leakage Rate Testing Program, to require a program that is in accordance with Nuclear Energy Institute (NEI) topical report NEI 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J." This proposed change will allow extension of the Type A test interval up to one test in 15 years and extension of the Type C test interval up to 75 months, based on acceptable performance history as defined in NEI 94-01, Revision 3-A. The purpose of this email is to provide **DRAFT** results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that the information delineated in the **DRAFT** enclosure to this email is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment/relief request in terms of regulatory requirements and the protection of public health and safety and the environment.

After reading in enclosed **DRAFT** questions, please contact me about setting up phone call with your staff to make sure you understand the questions. Per the guidance in Office Instruction LIC-109, we would like to have the call this week.

Thanks.

*Justin C. Poole*
*Acting Chief*
*NRR/DORL/LPL3-2*
*U.S. Nuclear Regulatory Commission*
*(301)415-2048*

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**From:** Poole, Justin

**Created By:** Justin.Poole@nrc.gov

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"Ossing, Michael" <Michael.Ossing@nexteraenergy.com>
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SUPPLEMENTAL INFORMATION NEEDED

AMENDMENT REQUEST

NEXTERA ENERGY SEABROOK, LLC

SEABROOK STATION, UNIT NO. 1

DOCKET NO. 50-443

**Background**

By letter dated March 31, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16095A278), NextEra Energy Seabrook, LLC (NextEra) submitted a license amendment request (LAR) to revise Technical Specification (TS) 6.15, Containment Leakage Rate Testing Program. The proposed amendment would revise the TS to require a containment leakage rate testing program that is in accordance with Nuclear Energy Institute (NEI) topic report NEI 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J."

The NRC staff has reviewed the LAR and concluded that the following information is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment and exemption in terms of regulatory requirements and the protection of public health and safety and the environment.

EMCB-1

Section 3.2.1.2 of your submittal states that Seabrook has committed as part of license renewal to maintain the exterior surface of the Containment Structure, from elevation -30 feet to +20 feet, in a dewatered state. NRR Office Instruction LIC-109, "Acceptance Review Procedures," (ADAMS Accession No. ML091810088) notes that a requested licensing action should not be accepted if it is contingent upon another review. The license renewal review is not complete and the adequacy of associated commitments has not been determined by the NRC staff.

Please provide additional explanation of why the dewatering is relevant to this LAR, and if relevant, how this action is being tracked under the current licensing basis.

EMCB-2

NEI 94-01, Revision 3-A, Section 9.2, notes that a visual examination shall be conducted of accessible surfaces of the containment for structural problems that may affect either the containment leakage integrity of the performance of the Type A test. Section 3.2.1.2 of your

submittal provides a very high-level summary of the Alkali-Silica Reaction (ASR) concrete degradation indications on the containment structure; however, no discussion is provided about the impacts of the degradation on the containment structure.

Please discuss the ASR degradation impact on the containment, including justification for extending the Type A test interval considering the previous test was conducted before ASR indications were identified on the containment building.

APLA-1

The LAR specifies that the technical basis for the proposed change utilizes a risk impact evaluation yielding results within the limits set forth by EPRI Technical Report (TR) TR-1009325, Revision 2 (ADAMS Accession No. ML072970208). The NRC safety evaluation report for the EPRI TR (ADAMS Accession No. ML081140105), directs the licensee to submit documentation indicating that the technical adequacy of their Probabilistic Risk Assessment (PRA) is consistent with the requirements of RG 1.200 (ADAMS Accession No. ML090410014) relevant to the ILRT extension application. RG 1.200, Revision 2 states that to demonstrate the technical adequacy of the PRA used in an application is of sufficient quality a discussion of the resolution of pertinent PRA peer review findings and observations (F&Os) be included.

While Attachment 4, Appendix A, of your submittal provides a high-level summary of industry peer reviews and self-assessments, specific applicable Seabrook F&Os were not included. Thus, to demonstrate the technical adequacy of the Seabrook PRA against RG 1.200, Revision 2, submit a list of all F&Os cited as Findings from the latest full- and focused-scope peer reviews that were conducted for any hazard for which a PRA model exists and was peer reviewed including any self-assessments which were not closed by a subsequent peer review and for which the PRA failed to meet Capability Category I (CC I) of the applicable PRA standard supporting requirements, including any cited as Not Met. For each F&O include details regarding its disposition, and an explanation of why not meeting the corresponding CC I requirement has no impact on the application.

DRAFT