### NRR-PMDAPEm Resource

From: Poole, Justin

Sent: Thursday, November 10, 2016 3:23 PM

**To:** Browne, Kenneth

Cc: Thomas, Christine; Brown, Victoria - Seabrook Station Licensing Dept

**Subject:** Need for Supplement to ILRT license amendment

## Ken.

On October 27, 2016, NextEra provided responses to the NRC staff's request for additional information (RAI) related to the license amendment request regarding extending containment leakage testing frequency. On November 7, we held a call with your staff to clarify the responses to RAIs 1 and 4a. As discussed during the call, the NRC staff would like you to clarify the following on the docket in a supplemental response.

### RAI 1:

- Page 3 of SBK-L-16165 describes that that difference in CDF is attributable to use of level 1 values for internal events, internal flooding, external flooding and severe weather from the 2014 PRA update vs. the 2011 PRA. The NRC staff would like to clarify if the "modeling changes" made in the 2014 PRA update constitute an "upgrade" (as defined by the PRA Standard as endorsed by RG 1.200, Rev. 2) such that a focused-scope peer review would have been needed.
- The staff believes there was a transcribing error in Table 1 from the information that was provided in the application (External floods: 2.09E-8 vs. 2.86E-8).

### RAI 5:

- Page 8 of SBK-L-16165 provides the requested sensitivity analysis. It is stated that "... CDF is approximately 2.5E-5/yr, an increase of 109%, above the baseline value of 1.20E-5/yr." The staff noted that this increase in CDF is significant. Since external events contribute substantially to CDF, the NRC would like to clarify if sensitivity analysis also included external events (e.g. fire). If so, was a floor value of 1E-6 or 1E-5 used?
- The staff believes there is a typo in Table 5-7.

## Thanks.

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