

## SeabrookLANPEm Resource

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**From:** Poole, Justin  
**Sent:** Monday, April 30, 2018 4:11 PM  
**To:** Browne, Kenneth; Carley, Edward  
**Cc:** Thomas, Christine; Greene, Joshua  
**Subject:** modification to one of the DRAFT RAIS  
**Attachments:** Seabrook ASR LAR - ESEB Followup RAIs - 4-25-18 EB.docx

**Importance:** High

Ken/Ed,

Staff is proposing a slight modification to the last question to be a little more specific. If you have questions, you can call me prior to the clarification call or we can just discuss the changes then. Thanks.

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**Hearing Identifier:** Seabrook\_LA\_NonPublic  
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**Subject:** modification to one of the DRAFT RAIS  
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**From:** Poole, Justin

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

**Recipients:**

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MESSAGE	335	4/30/2018 4:10:00 PM
Seabrook ASR LAR - ESEB Followup RAIs - 4-25-18 EB.docx		35274

**Options**

**Priority:** High  
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## **RAI-D14**

### **Background**

10 CFR Part 50.34(b), "Final safety analysis report," describes what a licensee must include in a final safety analysis report. This includes "a description and analysis of the structures, systems and components of the facility, with emphasis upon performance requirements, the bases, with technical justification therefor, upon which such requirements have been established, and the evaluations required to show that safety function will be accomplished."

10 CFR Part 50.71(e), "Maintenance of records, making of reports," requires, in part, that licensees shall submit updates to the final safety analysis report (FSAR) to include "all the changes necessary to reflect information and analyses submitted to the Commission by the applicant or licensee ... since the last update to the FSAR."

- 1) The response to RAI-M2, Request 1, and RAI-M3, including Appendix B of the response (Reference 2), summarizes (i) corroboration studies of the correlation methodology in MPR-4153, and (ii) periodic assessment of ASR expansion behavior that will be conducted in the future to confirm that ASR expansion behavior in Seabrook structures is similar to that observed in the MPR/FSEL LSTP specimens.
- 2) The response to RAI-D2 (Reference 3) references a Methodology Document that defines the analysis and evaluation procedures for the analysis described in the original LAR. Sections 3.1, 4.2, 4.3 and 4.4 of the Methodology Document describe how the proposed ASR load is developed and Section 5.6 of the Methodology Document identifies five 'supplements,' which are described as "deviations to the codes of record."

### **Issue**

- 1) Verifying similar ASR expansion behavior between the MPR/FSEL LSTP specimens and Seabrook structures is part of the technical justification for the expansion limits and acceptance criteria developed in the MPR/FSEL LSTP. The future actions associated with the corroboration study and the periodic assessment of ASR behavior appear to be key aspects of this justification; however, these supporting actions are not described in the FSAR update markup for the LAR.
- 2) The codes of record, and any supplements or deviations, explain how structures are analyzed and how their safety functions will be accomplished and form an important part of the changes to the method of evaluation described in the FSAR; however, the development of the proposed ASR load and the 'supplements' to the Seabrook code of record are not described in the FSAR update markup for the LAR.

### **Request**

- 1) Provide an UFSAR markup that includes a summary description of the proposed corroboration study and the periodic behavior assessment, including timeline, or explain why it is unnecessary to identify these items in the UFSAR as part of the proposed method of evaluation.

- 2) Provide an UFSAR markup that includes a summary description of how the ASR load, including the load due to expansion of concrete backfill, is determined and a complete description of the code 'supplements' identified in response to RAI-D2. Alternatively, or explain why it is unnecessary to explain how this Seabrook unique load is developed and to identify these code deviations in the UFSAR as part of the proposed method of evaluation.

DRAFT