



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
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KING OF PRUSSIA, PENNSYLVANIA 19406-2713

February 5, 2020

Mr. Don Moul
Vice President, Nuclear Division and
Chief Nuclear Officer
Florida Power & Light Company
Mail Stop: NT3/JW
15430 Endeavor Drive
Jupiter, FL 33478

SUBJECT: SEABROOK STATION, UNIT NO. 1 – INTEGRATED INSPECTION REPORT
05000443/2019004

Dear Mr. Moul:

On December 31, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Seabrook Station, Unit No. 1. On January 16, 2020, the NRC inspectors discussed the results of this inspection with Mr. Eric McCartney, Site Vice President and other members of your staff. The results of this inspection are documented in the enclosed report.

One finding of very low safety significance (Green) is documented in this report. This finding involved a violation of NRC requirements. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violation or the significance or severity of the violation documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement; and the NRC Resident Inspector at Seabrook Station, Unit No. 1.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; and the NRC Resident Inspector at Seabrook Station, Unit No. 1.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Brice A. Bickett, Chief
Reactor Projects Branch 3
Division of Reactor Projects

Docket No. 05000443
License No. NPF-86

Enclosure:
As stated

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SUBJECT: SEABROOK STATION, UNIT NO. 1 – INTEGRATED INSPECTION REPORT
05000443/2019004 DATED FEBRUARY 5, 2020

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Number: 05000443

License Number: NPF-86

Report Number: 05000443/2019004

Enterprise Identifier: I-2019-004-0042

Licensee: NextEra Energy Seabrook, LLC

Facility: Seabrook Station, Unit No. 1

Location: Seabrook, NH

Inspection Dates: October 01, 2019 to December 31, 2019

Inspectors: P. Cataldo, Senior Resident Inspector
T. Daun, Resident Inspector
J. Bundy, Operations Engineer
N. Floyd, Senior Reactor Inspector
B. Fuller, Senior Operations Engineer

Approved By: Brice A. Bickett, Chief
Reactor Projects Branch 3
Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Seabrook Station, Unit No. 1, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

Inadequate Procedure Compliance to Ensure Representative Carbon Sampling for Containment Enclosure Emergency Air Cleanup System			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Barrier Integrity	Green NCV 05000443/2019004-01 Open/Closed	[H.8] - Procedure Adherence	71111.19
The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," when steps for refilling carbon sample canisters for the 'B' train containment enclosure emergency air cleanup system were not accomplished in accordance with the documented instructions to ensure a representative carbon sample was obtained as required by Seabrook Station, Unit No. 1 Technical Specification 4.6.5.1.b. Specifically, Seabrook Station refilled test canisters partially with carbon from the no-flow area above the top of the filter screen which had not been exposed to the same service conditions as the absorber section.			

Additional Tracking Items

None.

PLANT STATUS

Seabrook Station began the inspection period operating at 100 percent rated thermal power. There were no operational power changes of regulatory significance for the inspection period.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors performed plant status activities described in IMC 2515, Appendix D, "Plant Status," and conducted routine reviews using IP 71152, "Problem Identification and Resolution." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Seasonal Extreme Weather Sample (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated readiness for seasonal extreme weather conditions prior to the onset of seasonal cold temperatures for the service water and emergency feedwater systems, throughout the month of November.

71111.04Q - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (3 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

- (1) 'B' residual heat removal during 'A' residual heat removal maintenance on October 15
- (2) Service water during cooling tower fan maintenance on October 16
- (3) 'A' safety injection pump during corrective maintenance on '6B' safety injection pump on November 7

71111.05Q - Fire Protection

Quarterly Inspection (IP Section 03.01) (5 Samples)

The inspectors evaluated fire protection program implementation in the following selected areas:

- (1) 'B' diesel generator fuel oil tank room (DG-F-1B-A) on November 21
- (2) 'B' electrical tunnel (ET-F-1C-A) on December 23

- (3) 'B' electrical chase (ET-F-1D-A) on December 23
- (4) 'A' electrical tunnel (ET-F-1A-A) on December 27
- (5) 'A' electrical chase (ET-F-1B-A) on December 27

71111.07A - Heat Sink Performance

Annual Review (IP Section 02.01) (1 Sample)

The inspectors evaluated readiness and performance of:

- (1) 'B' emergency diesel generator jacket water heat exchanger on December 20

71111.11A - Licensed Operator Requalification Program and Licensed Operator Performance

Requalification Examination Results (IP Section 03.03) (1 Sample)

- (1) The inspectors reviewed and evaluated the licensed operator examination failure rates for the requalification annual operating exam administered on December 19

71111.11B - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Requalification Program (IP Section 03.04) (1 Sample)

- (1) Biennial Requalification Written Examinations

The inspectors evaluated the quality of the licensed operator biennial requalification written examination administered on December 12.

Annual Requalification Operating Tests

The inspectors evaluated the adequacy of the facility licensee's annual requalification operating test.

Administration of an Annual Requalification Operating Test

The inspectors evaluated the effectiveness of the facility licensee in administering requalification operating tests required by 10 CFR 55.59(a)(2) and that the facility licensee is effectively evaluating their licensed operators for mastery of training objectives.

Requalification Examination Security

The inspectors evaluated the ability of the facility licensee to safeguard examination material, such that the examination is not compromised.

Operator License Conditions

The inspectors evaluated the licensee's program for ensuring that licensed operators meet the conditions of their licenses.

Control Room Simulator

The inspectors evaluated the adequacy of the facility licensee's control room simulator in modeling the actual plant, and for meeting the requirements contained in 10 CFR 55.46.

71111.11Q - Licensed Operator Regualification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

- (1) The inspectors observed and evaluated licensed-operator performance in the control room during power reduction and subsequent power ascension associated with turbine control valve testing on October 4.

Licensed Operator Regualification Training/Examinations (IP Section 03.02) (1 Sample)

- (1) The inspectors observed and evaluated licensed-operator annual regualification exams in the simulator on November 25.

71111.12 - Maintenance Effectiveness

Routine Maintenance Effectiveness Inspection (IP Section 02.01) (2 Samples)

The inspectors evaluated the effectiveness of routine maintenance activities associated with the following equipment and/or safety significant functions:

- (1) Maintenance Rule functional failure associated with control building air handling system heater elements on December 12
- (2) Maintenance Rule (a)(3) assessment during the months of November and December

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (4 Samples)

The inspectors evaluated the risk assessments for the following planned and emergent work activities:

- (1) Switchyard and residual heat removal system maintenance on October 15
- (2) Emergent work control associated with down-power on November 22
- (3) Elevated risk due to quarterly control rod testing on December 2
- (4) Elevated risk due to vital safety bus 6 synchronization check relay preventive maintenance on December 3

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 02.02) (3 Samples)

The inspectors evaluated the following operability determinations and functionality assessments:

- (1) 'B' train solid state protection system logic board failure on November 4
- (2) '1D' vital battery degraded cells on November 6
- (3) Control rod drive mechanism thermal sleeve flange 10 CFR Part 21 report on December 12

71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (1 Sample)

The inspectors evaluated the following temporary or permanent modifications:

- (1) Temporary engineering change associated with modification of electrical penetration seal to support containment enclosure ventilation area water intrusion sump pump on December 19

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (6 Samples)

The inspectors evaluated the following post maintenance tests:

- (1) 'A' service water cooling tower fan, SW-FN-51A, operational testing following maintenance on October 16
- (2) 1-EAH-F-69 charcoal filter replacement and leak testing on October 29
- (3) '6B' safety injection pump oil cooler leak repair on November 7
- (4) Transducer replacement for letdown divert control valve on December 9
- (5) '1E' inverter following circuit card replacement on December 9
- (6) 'A' service water pump and motor replacement on December 16

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

RCS Leakage Detection Testing (IP Section 03.01) (1 Sample)

- (1) Monthly technical specification controlled reactor coolant system leakage surveillance on November 13

FLEX Testing (IP Section 03.02) (1 Sample)

- (1) FLEX low pressure pump periodic testing on November 6 and November 18

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicator submittals listed below:

MS05: Safety System Functional Failures (SSFFs) Sample (IP Section 02.04) (1 Sample)

- (1) For the period October 1, 2018 through September 30, 2019

MS09: Residual Heat Removal Systems (IP Section 02.08) (1 Sample)

- (1) For the period October 1, 2018 through September 30, 2019

MS10: Cooling Water Support Systems (IP Section 02.09) (1 Sample)

- (1) For the period October 1, 2018 through September 30, 2019

71152 - Problem Identification and Resolution

Semiannual Trend Review (IP Section 02.02) (1 Sample)

- (1) The inspectors reviewed the licensee's corrective action program for potential adverse trends that might be indicative of a more significant safety issue.

Annual Follow-up of Selected Issues (IP Section 02.03) (3 Samples)

The inspectors reviewed the licensee's implementation of its corrective action program related to the following issues:

- (1) Human performance and risk recognition recovery (actions to effect changes to operator performance in procedure use and adherence and risk recognition) following loss of primary component cooling water in October 2018
- (2) Review of alkali-silica reaction impact on concrete structures
- (3) Recurrent primary component cooling water temperature controller deficiencies

INSPECTION RESULTS

Inadequate Procedure Compliance to Ensure Representative Carbon Sampling for Containment Enclosure Emergency Air Cleanup System			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Barrier Integrity	Green NCV 05000443/2019004-01 Open/Closed	[H.8] - Procedure Adherence	71111.19
The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," when steps for refilling carbon sample canisters for the 'B' train containment enclosure emergency air cleanup system were not accomplished in accordance with the documented instructions to ensure a representative carbon sample was obtained as required by Seabrook Station, Unit No. 1 Technical Specification 4.6.5.1.b. Specifically, Seabrook Station refilled test canisters partially with carbon from the no-flow area above the top of the filter screen which had not been exposed to the same service conditions as the absorber section.			
<u>Description:</u> The containment enclosure ventilation system is configured and functions such that the ventilation air is controlled to flow from areas of low potential radioactivity toward areas of higher potential radioactivity, and then exhaust to the plant vent for atmospheric			

dispersion. Radioactivity releases are maintained within technical specification limits by the containment enclosure emergency air cleanup system. Following an accident, the containment enclosure emergency air cleanup system removes and retains airborne particulates and radioactive iodine through high energy particulate filters and carbon absorption beds.

Seabrook Station Technical Specification surveillance requirement 4.6.5.1.b requires laboratory testing of a representative carbon sample from the containment enclosure emergency air cleanup system obtained in accordance with regulatory position C.6.b of Regulatory Guide 1.52, Revision 2, every 18 months. Seabrook Station utilizes test canisters filled with carbon, equivalent to the thickness of the absorber bed, and located in parallel with the absorber section. The system is designed for a total of six test canisters installed in each filter train.

In March 2018, action request 2254288 was written identifying that carbon canisters in emergency air cleanup system filter 69 needed to be replenished since there was only one remaining following removal for testing. In September 2019, the last remaining carbon test canister was removed, and the carbon was sent off for testing. On October 29, 2019, work order 40591643 was utilized to refill test canisters for filter 69 using a grain thief to remove carbon from the absorber section and refill the test canisters. The work order directed the removal of the carbon in the overfill until the perforated section of the channel to be sampled is uncovered. Inspectors observed this activity and observed that the carbon was removed only up to the top of the channel frame. This was performed multiple times to obtain enough carbon from the absorber bed to refill the six carbon test canisters. The test canisters were installed into the filter train, leak testing was performed, and the filter train was returned to a standby condition.

Inspectors continued to question if the carbon obtained from the no-flow area above the tops of the screens was representative of the absorber bed as required by C.6.b of Regulatory Guide 1.52, Revision 2. Seabrook Station initiated condition report 2338032 and determined that the carbon in the overfill area was not adequately removed to ensure representative samples were obtained from the absorber bed.

Corrective Actions: Seabrook Station initiated condition report 2338032 to ensure that the carbon in the test canisters for EAH filter 69 is discarded and new samples representative of the absorber bed are obtained for testing and refilling the test canisters during the next surveillance test.

Corrective Action References: CR 2333474, CR 2333908, CR 2334348, CR 2336430, CR 2338032

Performance Assessment:

Performance Deficiency: The inspectors determined that refilling the carbon sample canisters using carbon that was not representative of the service conditions of the absorber bank was contrary to Regulatory Guide 1.52, and Seabrook Station work instructions, and was reasonably within their ability to foresee and correct and should have been prevented, and therefore was a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, carbon that was not representative of the service conditions of the

absorber bed would have been utilized for technical specification required surveillance testing for the next nine years during which the methyl iodine penetration of the absorber bed could have exceeded five percent and not been discovered during surveillance testing. This could have resulted in post-accident radioactive iodine concentrations in excess of the accident analysis being released from the plant vent.

Significance: The inspectors assessed the significance of the finding using Exhibit 3, IMC 0609, Appendix A, "The Significance Determination Process for Findings At-Power." The finding, while associated with the barrier integrity cornerstone, only represents a degradation of the radiological barrier function provided by the emergency air handling system's filter and absorption beds within the containment enclosure building, therefore, the inspectors determined the finding was of very low safety significance (Green).

Cross-Cutting Aspect: H.8 - Procedure Adherence: Individuals follow processes, procedures, and work instructions. Specifically, the work instructions directed the removal of the carbon overfill until the perforated section of the channel to be sampled is uncovered but the carbon was removed only down to the top of the metal frame.

Enforcement:

Violation: Title 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings" requires, in part, that "activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions." Contrary to this, on October 29, 2019, the removal of carbon from the absorber bed of the containment enclosure emergency exhaust cleanup system filter 69 was not accomplished in accordance with the step text in work order 40591643 such that the carbon overfill was not removed until the perforated section of the channel was uncovered. This resulted in carbon that was not representative of the service conditions of the absorber bed to be placed in carbon test canisters for use in future Technical Specification required surveillance testing.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Observation: Semi-Annual Trend Review

71152

The inspectors reviewed NextEra's corrective action program for trends that might be indicative of more significant safety issues. The inspectors reviewed condition reports, level one assessments, system health reports, and control room/panel deficiencies. In particular, the inspectors evaluated the condition reports generated during the second half of 2019 to identify any negative trends in equipment and human performance, as well as problem identification and resolution.

The inspectors focused primarily on the overall identification of potential adverse trends identified not only through the initial screening performed by the corrective action program coordinators for the applicable departments, but also from the identification of potential or cognitive trends that have revealed potential performance declines in particular areas, during the reviews performed by the Management Review Committee.

The inspectors contrasted the issues identified during their review of condition reports for the second half of 2019, with those issues that could be considered potential adverse or cognitive

trends identified by NextEra staff from the programs and processes discussed above. The inspectors verified actions were consistent with the corrective action program requirements.

The inspector's overall review resulted in an assessment of trending that was consistent with the identified cognitive trends, human performance trends, and those more closely aligned with plant and equipment issues. For example, the inspectors reviewed assessments performed to address (1) electrical component failures, such as power supplies, (2) maintenance supervisory performance issues, (3) cognitive trends in the performance of thermography, (4) recurrent challenges to vital inverters, (5) a degrading trend in the 'D' vital battery cell voltages, and (6) emergency diesel generator fast start surveillance times trending upward.

Based on the overall results of the semi-annual trend review, the inspectors determined that issues were appropriately evaluated by NextEra staff for potential trends and resolved within the scope of the corrective action program and other requisite procedures.

Observation: Recurrent Primary Component Cooling Water Temperature Controller Deficiencies	71152
<p>The inspectors performed a review of recurrent issues associated with the 'B' train primary component coolant water controller that have been identified, at least since 2017. The inspectors reviewed (1) a sample of condition reports generated since 2017, both online and during the refueling outages, (2) several action request/condition reports and associated corrective actions associated with oscillations and problems identified with the temperature control valve 1-CC-TK-2271, and its associated components, (3) adverse condition monitoring and contingency plans associated with the temperature control valve and its controlling circuitry and (4) a review of the most-recent failure that occurred on December 31, 2019, and the associated troubleshooting and maintenance activities.</p> <p>The inspectors determined that NextEra's actions to address the deficiencies with the 'B' train primary component cooling water temperature controls, while remaining in existence over several years, included reasonable and appropriate troubleshooting and corrective maintenance activities. These activities included long-term corrective action planning to address the equipment reliability concerns. Although the December 31, 2019, issue with the 'B' train controller resulted in an entry into an abnormal operating procedure, the conditions that existed ensured the system continued to maintain its ability to perform its specified safety function.</p>	

Observation: Human Performance and Risk Recognition Recovery	71152
<p>The inspectors performed an in-depth review of the actions to address weaknesses in human performance and risk recognition following the loss of component cooling water in October 2018. The inspectors reviewed (1) a sample of condition reports generated since 2018, both online and during the refueling outages, (2) several action request/condition reports and associated corrective actions associated with human performance errors, (3) NextEra's evaluation and corrective actions associated with condition report 2284272, and (4) a review of condition report 2334190 which identified procedure use and adherence weaknesses in the operations department.</p> <p>The inspectors verified that NextEra properly evaluated the issues and implemented appropriate corrective actions. The inspectors determined that NextEra's actions to address weaknesses in human performance and risk recognition have been generally reasonable.</p>	

Observation: Review of Alkali-Silica Reaction Impact on Concrete Structures	71152
<p>The NRC performed a site visit during the week of October 6, to Seabrook Station, to review NextEra's monitoring of alkali-silica reaction on affected reinforced concrete structures, per their 10 CFR 50.65 "Maintenance Rule" Structures Monitoring Program, and NextEra's corrective action process. The inspectors verified on a sampling basis that significant changes or different presentations of alkali-silica reaction, if any, on the affected structures were appropriately considered for impact on the Seabrook operability determinations for the affected structures. In addition, the inspectors reviewed reports of recently collected measurement data, including combined crack index, in-plane expansion, through-wall expansion, and building deformation monitoring elements, to verify that the structures were within the established acceptable monitoring parameters.</p> <p>The inspectors also assessed whether NextEra staff were completing structural evaluations in accordance with the Structures Monitoring Program and the methodology document approved by the NRC. Based on the requirements in these documents, NextEra must evaluate the seismic Category I structures for susceptibility to alkali-silica reaction. The NRC inspection focused on those structures with areas identified by NextEra staff that did not meet the design acceptance criteria. At the end of this on-site inspection, there were no structures with newly identified issues; therefore, the inspectors did not perform detailed reviews of structural evaluations or calculations. The inspectors noted that there are eight remaining structural evaluations under review by NextEra. Based on discussions with NextEra staff, the estimated completion date for the remaining structural evaluations was early 2020.</p> <p>The inspectors performed independent walkdowns of ASR-affected areas with a focus on those structures currently undergoing evaluation. The inspectors did not observe any indications of loading distress or other structural integrity issues as evident by the absence of structural cracks. The inspectors specifically looked at the service water cooling tower, service water/circulating water pump house, waste processing building, intake/discharge transition structures, and the containment enclosure ventilation area north wall remediation.</p> <p>The inspectors reviewed the status of the open operability determinations related to alkali-silica reaction, including NextEra's action plan to close them. NextEra consolidated all the seismic Category I structures requiring remediation into one operability determination as part of a long-term resolution until plans for structural modification are completed. NextEra enhanced the monitoring of these structures through additional measurements of critical areas at an increased frequency. The inspectors verified that these compensatory measures were implemented and that the results met the established acceptance criteria.</p> <p>The inspectors concluded that NextEra staff continue to monitor reinforced concrete structures in accordance with Seabrook's program and procedures. Furthermore, the inspectors concluded that the structures remained capable of performing their intended function by meeting the established monitoring limits and that issues were appropriately identified and evaluated by NextEra staff.</p>	

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On January 16, 2020, the inspectors presented the integrated inspection results to Mr. Eric McCartney, Site Vice President and other members of the licensee staff.
- On October 10, 2019, the inspectors presented the alkali-silica reaction problem identification and resolution semi-annual sample inspection results to Eric McCartney, Site Vice President and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71152	Corrective Action Documents	AR 02014325		
		AR 02193235		
		AR 02215578		
		AR 02276197		
		AR 02301508		
		AR 02318202		
		AR 02327710		
		AR 02328587		
	Miscellaneous	SMPM	Structures Monitoring Program Manual	Revision 8
	Work Orders	40640725		