March 20, 2020

10 CFR 50.55a
SBK-L-20017

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

Seabrook Station
Docket No. 50-443

Subject: Relief Request SG-1, Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1), Use of Code Case OMN-13 with 2012 Edition of the OM Code

In accordance with the provisions of 10 CFR 50.55a(z)(1), NextEra Energy Seabrook, LLC (NextEra) requests NRC approval of the attached relief request for Seabrook Station (Seabrook). The third IST interval ends on August 17, 2020. The fourth interval of the Seabrook Inservice Test (IST) program will comply with the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 2012 Edition.

ASME has approved Code Case (CC) OMN-13, "Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants," Revision 2. This CC is unconditionally approved for use in Regulatory Guide (RG) 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," Revision 2.

However, CC OMN-13, "Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants," Revision 2, states in the Applicability section that it is applicable to ASME OM Code 1995 Edition through 2011 Addenda. The attached relief request proposes use of CC OMN-13 for snubbers during the fourth interval of the Seabrook IST program.

NextEra requests NRC review and approval of the proposed relief request by August 1, 2020 to allow use of the alternatives in the fourth IST interval, which begins August 18, 2020.

There are no commitments being made in this submittal.

If you have any questions regarding this submittal, please contact me at (603) 773-7932.

Sincerely,

NextEra Energy Seabrook, LLC

Christine Thomas for
Kenneth J. Browne
Safety Assurance and Learning Site Director

Enclosure 1: Proposed Alternative for Seabrook Unit 1in Accordance with 10 CFR 50.55a(z)(1) - Relief Request SG-1, Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1), Use of Code Case OMN-13 with 2012 Edition of the OM Code

cc:

NRC Region I Administrator
NRC Project Manager
NRC Senior Resident Inspector

Enclosure 1 to SBK-L-20017

Relief Request Number SG-1

Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1), Use of Code Case OMN-13 with 2012 Edition of the OM Code

**Proposed Alternative**
**In Accordance with 10 CFR 50.55a(z)(1)**

--Alternative Provides Acceptable Level of Quality and Safety--

**Relief Request SG-1, Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1), Use of Code Case OMN-13 with 2012 Edition of the OM Code**

## 1. ASME Code Component(s) Affected

Component Numbers: All snubbers within the scope of the Seabrook Station (Seabrook) Inservice Test (IST) Program.

Description: Performance Based Requirements for Extending Snubber Inservice Visual Examination Intervals

## 2. Applicable Code Edition and Addenda

The applicable Code of record for NextEra Energy's Seabrook Station (Seabrook) for the Inservice Testing (IST) Fourth Testing Interval will be ASME OM-2012, Operation and Maintenance of Nuclear Power Plants.

## 3. Applicable Code Requirement

ISTA-3130, Application of Code Cases, subparagraph (b), states, "Code Cases shall be applicable to the edition and addenda specified in the test plan."

## 4. Reason for Request

In accordance with 10 CFR 50.55a, "Codes and Standards," paragraph (z)(1), an alternative is proposed to ISTA-3130(b) requirements for implementing Code Case (CC) OMN-13, "Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants," Revision 2 (Reference 1). The basis of the request is that the proposed alternative would provide an acceptable level of quality and safety.

ISTA-3130(b) states, "Code Cases shall be applicable to the edition and addenda specified in the test plan." ASME has approved CC OMN-13. This CC is unconditionally approved for use in Regulatory Guide (RG) 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," Revision 2 (Reference 2). The Seabrook code of record for the fourth ten-year IST interval will be the ASME OM-2012 Edition. However, CC OMN-13, Revision 2, states in the Applicability section that it is applicable to ASME OM Code 1995 Edition through 2011 Addenda. Seabrook will be implementing the ASME OM-2012 Edition and also proposes to implement CC OMN-13.

Seabrook used CC OMN-13, Revision 0, during the previous ten-year Inservice Inspection (ISI) interval and proposes to continue with Revision 2 of this CC for the subsequent ten-year IST interval. Based on the required update of the ISI program and 10 CFR 50.55a(b)(3)(v), OM Condition: Snubbers ISTD, item (B), the requirements for snubbers are moving from

ASME Section XI to the OM Code; therefore, this CC OMN-13 request is associated with the next snubber ten-year IST interval.

## 5. Proposed Alternative and Basis for Use

The proposed alternative to ISTA-3130(b) is requested to implement this CC since the CC Applicability statement covers only 1995 Edition through the 2011 Addenda and ISTA-3130(b) requires applicability to the edition specified in the test plan, which would be the ASME OM-2012 Edition.

RG 1.192, Revision 2, Table 1, "Acceptable OM Code Cases," lists CC OMN-13, Revision 2 (2012 Edition) as acceptable to the NRC for application in a licensee's IST program.

Using the provisions of this request as an alternative to the requirements of ISTA-3130(b) will provide adequate detection of observable snubber degradation and, along with the testing and service life monitoring requirements of Subsection ISTD, will continue to provide reasonable assurance of the operational readiness of Seabrook snubbers. Therefore, the proposed alternative provides an acceptable level of quality and safety in accordance with 10 CFR 50.55a(z)(1).

## 6. Duration of Proposed Alternative

The provisions of this relief are applicable for the duration of the Fourth Ten-Year Inservice Testing (IST) program applicable for Seabrook Station, which will commence on August 18, 2020, or until Code Case OMN-13, Revision 2 is incorporated into a future revision of Regulatory Guide 1.192, referenced by a future revision of 10 CFR 50.55a, whichever occurs first.

## 7. Precedents

- R. E. Ginna Nuclear Power Plant, Relief Request Associated with Snubber lnservice Testing Program for the Sixth Ten-Year Interval, dated June 26, 2019, ML19177A218
- Clinton Power Station, Unit 1, Relief Request 14-RS-1 to Use Code Case OMN-13, dated December 11, 2019, ML19345F139
- Braidwood Station, Units 1 and 2, Braidwood Station Relief Request 14-RS-1 to Implement Code Case OMN-13, dated January 31, 2019, ML19031C900

## References


1. Code Case OMN-13, "Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants," Revision 2
2. NRC Regulatory Guide 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," Revision 2.