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Docket: NRC-2024-0025

Monthly Notice; Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving No Significant Hazards Considerations

Comment On: NRC-2024-0025-0001

Monthly Notice; Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving No Significant Hazards Considerations

Document: NRC-2024-0025-DRAFT-0001

Comment on FR Doc # 2024-01255

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General Comment

See attached file(s)

Attachments

C-10 Public Comment on NRC-2024-0025_2.21.24

-1-

Public Comment on Docket NRC-2024-0025, submitted by Sarah Abramson, Deborah Breen

Date: February 21, 2024

Re: Docket ID: [NRC-2024-0025](#)
Facility Name: NextEra Energy Seabrook, LLC
Unit Number: Seabrook Station Unit No. 1
Docket No(s): 50-443
Application Date: December 9, 2022
Amendment Date: December 22, 2023
ADAMS Accession No: [ML23312A182](#)
Amendment No(s)172

Subject: Issuance of Amendment No 172 - Revision to Cooling Tower Service Water Loop or Cell Requirements.

The operating license of Seabrook Station prior to this amendment allowed the reactor to continue running for up to 7 days with one of the two Service Water (SW) cooling tower loops out of service. If the SW was not back in service when the 7-day clock ran out, the reactor had to be shut down within 6 hours. While only one loop is needed to adequately provide continuous cooling water to the reactor, two loops provide assurance that this essential need is met. The license amendment dated December 22, 2023 ([ML23312A182](#)) extended the length of the Allowable Outage Time (AOT), from 7 to 21 days, that Seabrook Station can continue to keep the reactor critical with one of the two cooling tower loops in the service water system out of service.

In such a scenario where only one SW cooling tower loop is operational, another coinciding event could occur impacting the sole remaining SW cooling tower loop which could result in serious operability and safety issues. For example, in the Seabrook Station Integrated Inspection Report for Q4 of 2023 ([ML24043A002](#)), a minor violation was cited when a technician at the plant used a container tainted with one type of oil (Oil A) to gather a different type of oil (Oil B) for an oil change in the Residual Heat Removal (RHR) pump. Third party testing of an oil

sample following that oil change caught that the viscosity was not as expected and the RHR pump was flushed, requiring shutting down its related SW tower loop. What if the RHR pump had seized or otherwise failed before the third party sample test flagged this issue; while at the same time the other SW cooling tower was down?

Seeing such careless mistakes such as this oil issue, paired with frequent and repetitive fire-safety violations at Seabrook Station, raises concern. The number of fire-safety related violations in the last three years is higher than most other licensees in Region 1, with five (5) violations cited between 1/1/21 and 6/30/23 ([ML21119A260](#), [ML22040A204](#), [ML22304A180](#), [ML23030A482](#), [ML23220A209](#)). This would imply that the plant staff are not currently able to manage these safety-intensive tasks safely and adequately. The NRC's risk-analysis related to this amendment should use data specifically from Seabrook Station's recent safety record. A simplistic view of this amendment's increase in SW allowable outage time from 7 to 21 days, would be that the risk of losing both SW cooling towers at the same time is now tripled. The Nuclear Regulatory Commission should consider if this tripling of risk is in furtherance of its codified purpose of protecting people and the environment.

Seabrook Station has operated for many years abiding by the original operating license requirements. It is not clear in the license amendment request submitted by NextEra on December 9, 2022 ([ML22343A259](#)) nor the issuance of the amendment by the NRC on December 22, 2023 ([ML23312A182](#)) why such a change is needed at this time.

C-10 respectfully submits that the Nuclear Regulatory Commission must ascertain answers to the following questions, and use such answers in their consideration of the appropriateness of this approved license amendment.

1. How does allowing a safety system, even a redundant one, to remain out of service while the reactor continues operating, three times longer than originally designed, provide the same level of safety as the original requirement? Particularly when the plant has aged over 30 years since the original requirement was implemented.
2. The Prompt Operability Determination (POD) in effect at Seabrook Station is a workflow reserved for the areas that are the most severely impacted by alkali-silica reaction (ASR). Structures in the POD are less able to withstand stress and are no longer within

the original design basis. As outlined in an October 7, 2021 letter from the NRC's Brice Bickett ([ML21280A262](#)), the structures that are in POD include the Service Water Cooling Tower, as well as the Residual Heat Removal (RHR) pump, and emergency feedwater water pump house, among others. The NRC's approval of this license amendment effectively increases the reliance on these compromised structures, what is the NRC's justification for this when there is already a significant operability and safety risk in those structures due to ASR? When considering risk to the public and environment, as required, did the NRC take the POD into consideration, including the fact that the Service Cooling Water Tower is among the most ASR-damaged structures at Seabrook Station and currently operating outside of design basis? NextEra's December 9, 2022 license amendment request did not include a single mention of alkali-silica reaction.

3. What problem is the amendment trying to resolve? What factors have changed to require three weeks to do a job that, up to now, has been done within one week?

As the plant ages and the ASR problem continues to worsen, we at C-10 feel strongly that every change that can impact the safety of residents that live near Seabrook Station must be fully understood in layman's terms.

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