

## SeabrookNPEM Resource

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**From:** Cliche, Richard [Richard.Cliche@nexteraenergy.com]  
**Sent:** Tuesday, September 18, 2012 1:33 PM  
**To:** Cunanan, Arthur  
**Subject:** Advance Copy Set 18 (OE) RAI Response  
**Attachments:** SBK-L-12183.pdf

Arthur,  
Attached, is an advance copy of SBK-L-12183, Operating Experience RAI Response.

### **Rick Cliche**

*License Renewal Project Manager*

*Seabrook Station*

[richard.cliche@fpl.com](mailto:richard.cliche@fpl.com)

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**Hearing Identifier:** Seabrook\_License\_Renewal\_NonPublic  
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**Subject:** Advance Copy Set 18 (OE) RAI Response  
**Sent Date:** 9/18/2012 1:33:11 PM  
**Received Date:** 9/18/2012 1:33:28 PM  
**From:** Cliche, Richard

**Created By:** Richard.Cliche@nexteraenergy.com

**Recipients:**  
"Cunanan, Arthur" <Arthur.Cunanan@nrc.gov>  
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September 18, 2012

SBK-L-12183

Docket No. 50-443

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Seabrook Station  
Response to Request for Additional Information  
NextEra Energy Seabrook License Renewal Application  
Request for Additional Information - Set 18 (Operating Experience)

References:

1. NextEra Energy Seabrook, LLC letter SBK-L-10077, "Seabrook Station Application for Renewed Operating License," May 25, 2010. (Accession Number ML101590099)
2. NextEra Energy Seabrook, LLC letter SBK-L-12001, "Seabrook Station Response to Request for Additional Information NextEra Energy Seabrook License Renewal Application Request for Additional Information – Set 18, RAI B.1.4-2 and B.1.4-3, January 20, 2012. (Accession Number ML12025A078)
3. NRC Letter, Requests For Additional Information For The Review Of The Seabrook Station, License Renewal Application-Set 18 (Operating Experience), September 10, 2012. (Accession Number ML12242A194)

In Reference 1, NextEra Energy Seabrook, LLC (NextEra) submitted an application for a renewed facility operating license for Seabrook Station Unit 1 in accordance with the Code of Federal Regulations, Title 10, Parts 50, 51, and 54.

In Reference 2, NextEra responded to the NRC requests for additional information related to Operating Experience.

In Reference 3, the NRC requested additional information regarding the ongoing Operating Experience Review Program in order to complete its review of the License Renewal Application (LRA).

Enclosure 1 provides NextEra's response to this latest request for additional information.

Provided in this Supplement are changes to the License Renewal Application (LRA). To facilitate understanding, the changes are explained, and where appropriate, portions of the LRA are repeated with the change highlighted by strikethroughs for deleted text and bolded italics for inserted text.

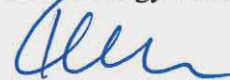
There are no new or revised regulatory commitments contained in this letter.

If there are any questions or additional information is needed, please contact Mr. Richard R. Cliche, License Renewal Project Manager, at (603) 773-7003.

If you have any questions regarding this correspondence, please contact Mr. Michael O'Keefe, Licensing Manager, at (603) 773-7745.

Sincerely,

NextEra Energy Seabrook, LLC.



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Kevin T. Walsh

Site Vice President

Enclosure 1- NextEra Responses to NRC Requests for Additional Information dated September 10, 2012

cc:

W.M. Dean,	NRC Region I Administrator
J. G. Lamb,	NRC Project Manager, Project Directorate I-2
J. Grieves,	NRC Resident Inspector
A.D. Cunanan,	NRC Project Manager, License Renewal
M. Wentzel,	NRC Project Manager, License Renewal

Mr. Christopher M. Pope  
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John Giarrusso, Jr., Nuclear Preparedness Manager  
The Commonwealth of Massachusetts  
Emergency Management Agency  
400 Worcester Road  
Framingham, MA 01702-5399



I, Kevin Walsh, Site Vice President of NextEra Energy Seabrook, LLC hereby affirm that the information and statements contained within are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

Sworn and Subscribed

Before me this

18 day of September, 2012

A handwritten signature in blue ink, appearing to read "Kevin T. Walsh".

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Kevin T. Walsh  
Site Vice President

A handwritten signature in black ink, appearing to read "Shirley Sweeney".

Notary Public



**Enclosure 1 to SBK-L-12183**

**NextEra Responses to NRC Requests for Additional Information  
dated September 10, 2012**



### **Request for Additional Information (RAI) B.1.4-4**

#### **Background**

By letter dated December 12, 2011, the U.S. Nuclear Regulatory Commission (NRC or the staff) issued request for additional information (RAI) B.1.4-2 requesting specific information on how NextEra Energy Seabrook, LLC (the applicant)'s operating experience review activities address issues related to aging. In this letter, the staff also issued RAI B.1.4-3 requesting the applicant provide additional details in the updated final safety analysis report (UFSAR) supplement consistent with the response to RAI B.1.4-2. By letter dated January 20, 2012, the applicant responded to RAI B.1.4-2 with additional information regarding its operating experience program. The applicant also provided an update to the UFSAR supplement in response to RAI B.1.4-3. Subsequently, on March 16, 2012, the NRC issued Final License Renewal-Interim Staff Guidance (LR-ISG)-2011-05, "Ongoing Review of Operating Experience," to clarify the staff's position that license renewal aging management programs (AMPs) should be informed, and enhanced when necessary, based on the ongoing review of both plant-specific and industry operating experience.

#### **Issue**

Based on its review of the applicant's responses, the staff determined that additional information is needed in order for the staff to determine whether the applicant's operating experience review activities will be consistent with LR-ISG-2011-05.

- a) Itemized Change NO.7 in LR-ISG-2011-05, Appendix A, states that the entries associated with the aging-specific identification code in the corrective action program (CAP) should be periodically reviewed to determine whether trending is necessary and that any adverse trend should be entered into the CAP for evaluation. In its response to RAI B.1.4-2, the applicant stated that, as an enhancement, it will develop a trend code to track and facilitate trending of age-related degradation issues and it also stated that current procedures address CAP performance monitoring and trending. However, it is not clear how these current procedures provide for the periodic review of items associated with the aging-specific identification code or how adverse trends associated with this code will be identified and whether any adverse trends will be entered into the CAP.
- b) Itemized Change No.7 in LR-ISG-2011-05, Appendix A, states that training on age-related degradation and aging management should be provided to plant personnel and that this training should occur on a periodic basis and include provisions to accommodate personnel turnover. In its response to RAI B.1.4-2, the applicant stated that, as an enhancement, it will clarify the type and periodicity of training and accounting of personnel turnover for those personnel responsible for screening, assigning, evaluating, and submitting aging related operating experience. In response to RAI B.1.4-3, the applicant also revised the UFSAR supplement to include a description of the training; however, this description does not state that the training is periodic or that it includes provisions to accommodate the turnover of plant personnel.

- c) Itemized Change No.7 in LR-ISG-2011-05, Appendix A, states that guidelines should be established for reporting plant-specific operating experience on age-related degradation and aging management to the industry. In its response to RAI B.1.4-2, the applicant described its criteria for reporting plant-specific operating experience to the industry; however, the staff determined that these criteria are general and do not specifically address aging. In addition, the staff found that the UFSAR supplement, as revised by letter dated January 20,2012, does not address reporting of aging-related operating experience to the industry.
- d) Itemized Change No.7 in LR-ISG-2011-05, Appendix A, states that any enhancements to the existing operating experience review activities should be put in place no later than the date the renewed operating license is issued. In response to RAI B.1.4-2, the applicant identified three enhancements, which include updating the operating experience procedure, developing an aging trend code, and training. The applicant stated that these actions will be completed as part of the renewed license implementation; however, it is not clear whether they will be completed by the date when the renewed operating license is issued.

#### Request

- a) Describe how entries in the CAP that are associated with the age-related degradation trend code will be periodically reviewed to determine whether trending is necessary and indicate whether any adverse trends will be entered into the CAP for evaluation.
- b) Revise the UFSAR supplement, consistent with the response to RAI B.1.4-2, to indicate that the training of plant personnel is periodic and accounts for personnel turnover.
- c) Describe guidelines that specifically address reporting of operating experience on age-related degradation and aging management to the industry. In addition, revise the UFSAR supplement to address reporting of plant-specific operating experience related to aging to the industry.
- d) Clarify whether the enhancements described in response to RAI B.1.4-2 will be implemented by the date when the renewed operating license is issued.

This request is for closure of Open Item OI B.1.4-2 in the safety evaluation report with open items.

#### NextEra Seabrook Response

- a) Describe how entries in the CAP that are associated with the age-related degradation trend code will be periodically reviewed to determine whether trending is necessary and indicate whether any adverse trends will be entered into the CAP for evaluation.



Response:

Response provided in reference (2), Item (c) is revised as follows:

NextEra has initiated an action to develop a trend code to be applied within the corrective action program to track and facilitate trending of age related degradation issues and operating experience. The code will be defined and specific to allow consistent application and assignment by plant personnel. Trend codes currently utilized are based on INPO guidance which promotes consistency throughout the industry. NextEra is working with the industry License Renewal Implementation working group in the development of additional trend codes applicable to license renewal.

Current NextEra procedures address corrective action program performance monitoring and trending. Under the renewed license program, this will also be applied to aging related operating experience. Aging related trend results will be evaluated for impact on the respective aging management programs.

*The existing NextEra condition identification and screening process procedure requires that corrective action program coordinators provide periodic departmental analysis of corrective action program data and trending, and ensuring that trend codes (event and cause codes) and keywords are properly assigned in accordance with plant procedures. Adverse trends are entered into the corrective action program for evaluation. Under the renewed license, these existing practices will also be applied to the age-related degradation trend code.*

- b) Revise the UFSAR supplement, consistent with the response to RAI B.1.4-2, to indicate that the training of plant personnel is periodic and accounts for personnel turnover.

Response:

NextEra has revised the UFSAR supplement to indicate that training of plant personnel is periodic and accounts for personnel turnover. See LRA Appendix A, Section A.1.6 changes as described in item (d) below.

- c) Describe guidelines that specifically address reporting of operating experience on age-related degradation and aging management to the industry. In addition, revise the UFSAR supplement to address reporting of plant-specific operating experience related to aging to the industry.

Response:

NextEra has revised the UFSAR supplement to address reporting of plant-specific operating experience related to aging to the industry. See LRA Appendix A, Section A.1.6 changes as described in item (d) below. Response provided in reference (2), Item (k) is revised as follows:

Operating experience concerning aging related degradation will be reported to the industry using the same criteria and processes as non-aging related issues. The current NextEra procedure for sharing operating experience with the industry cites the following as the minimum criteria for reporting using the INPO Nuclear Network.

- Important to Nuclear, Public, and Personnel Safety, including events of direct consequences or with high potential of consequence under slightly different circumstances.
- Important to Generation Capability
- Important to Operating Plant Construction or Modification Quality
- Events with Important Generic Implications (for example, training and accreditation, material issues, testing, and emergency planning)
- Events for which a comprehensive root cause investigation was performed and for which lessons learned would be beneficial to know had the event occurred at another station
- Actual classified emergencies
- Events required to be reported in INPO SOER/IER Level 1 recommendations

As stated in the existing NextEra operating experience procedure, operating experience entries should be posted on the INPO Nuclear Network within 50 days of the event.

*A recent revision to the NextEra procedure for operating experience program screening and responding to incoming operating experience incorporates the guidance of LR-ISG-2011-05 and includes a License Renewal Engineer in the composition of the site operating experience screening team, further assuring age-related degradation and aging management operating experience will be properly reported to the industry.*

- d) Clarify whether the enhancements described in response to RAI B.1.4-2 will be implemented by the date when the renewed operating license is issued.

Response:

Consistent with LR-ISG-2011-05, enhancements described in response to RAI B.1.4-2 will be implemented by the date when the renewed operating license is issued. The LRA Appendix A, Section A.1.6 which was last revised by Reference 2, has been further revised as follows:

A.1.6 Operating Experience

The existing Corrective Action Program and the Operating Experience Program ensure, through the continual review of both plant-specific and industry operating experience, that the license renewal aging management programs are effective to manage the aging effects for which they are credited. The programs are either enhanced or new programs are developed when the review of operating experience indicates that the programs may not be effective. For each aging

management program operating experience is reviewed on a continuing basis. Plant personnel responsible for screening, assigning, evaluating and submitting operating experience are trained to identify and evaluate aging related issues. Evaluation of aging related issues considers potentially affected plant systems, structures, components, materials, environments, aging effects, aging mechanisms and Aging Management Programs.

Aging related program changes, results of inspection activities and evaluation of relevant internal and external operating experience are tracked by the NextEra action tracking/corrective action program.

The operating experience reviews will include evaluation of applicable NUREGS, ISGs, etc., such as future revisions of NUREG-1801, "Generic Aging Lessons Learned (GALL)" Report. Programmatic features such as training of personnel, trending, record retention, self-assessments, etc., will be in accordance with the existing NextEra corrective action and operating experience programs. ***Training of plant personnel will be periodic and will account for personnel turnover. Operating experience concerning aging related degradation will be reported to the industry. Any enhancements necessary to fulfill the above criteria will be put in place no later than the date the renewed operating license is issued and implemented on an ongoing basis throughout the term of the renewed license.***