Group <u><u></u></u>

# FOIA/PA NO: 2013-0332

## OFFICIAL RECORDS TO BE MADE PUBLICLY AVAILABLE IN ADAMS

Heater, Keith

From:	
Sent:	
To:	
Subject:	

Floyd, Niklas Tuesday, September 17, 2013 12:59 AM Heater, Keith FOIA: Response to Request - Reg Process Outline - Seabrook ASR

From: Conte, Richard Sent: Thursday, February 07, 2013 7:57 AM To: Khanna, Meena Cc: Murphy, Martin: Thomas, George: Floyd, Nikla

**Cc:** Murphy, Martin; Thomas, George; Floyd, Niklas; Chaudhary, Suresh; Cook, William; Trapp, James; Raymond, William **Subject:** RE: Response to Request - Reg Process Outline - Seabrook ASR

Yes thanks but I appreciate George's attentiveness to the discussion yesterday and I think he is right. I revisited the words after the call

Look at 50.55, it is in the context of new construction even NRO activities with findings related to fuel load.

50.55a is like a extension dealing with codes and standards upon which to build the plant. Focus on the preamble to 50.55a right before section a(1). It clearly states that: "Each operating license.....is subject to the conditions in paragraphs (f) and (g) of this section in addition to those specified in 50.55." section a(3) deals getting NRR to authorize deltas to codes and standards

50.55 deals with Conditions of construction permits, early site permits, combined licenses and manufacturing licenses – all the current operating plant are well past this stage.

(f) deals with ISI for safety related pumps and valves

(g) deals with ISI for important material components

I am happy with the guidance and approach on 5071(e) which the licensee is obligated to do based on the requested analysis that was a part of the CAL. Thanks for that insight.

### From: Khanna, Meena

Sent: Wednesday, February 06, 2013 6:48 PM To: Conte, Richard Subject: RE: Response to Request - Reg Process Outline - Seabrook ASR

Rich, I will be meeting with George Thomas and Kamal Manoly and will update the 1 pager on the licensing outline regarding your 50.55a question..thanks.

From: Conte, Richard

Sent: Wednesday, February 06, 2013 12:11 PM
To: Lamb, John; Khanna, Meena
Cc: Trapp, James; Schroeder, Daniel; Dentel, Glenn; Cook, William; Raymond, William
Subject: RE: Response to Request - Reg Process Outline - Seabrook ASR

Got it thank you on your basis but I read 50.71(e) (4) differently. They are obligated to do the update annually or 6 month after refueling outage, not to exceed 24 months. The obligation is both May and Nov. 2013 doing it in April or May 2013 satisfies both

From: Lamb, John Sent: Wednesday, February 06, 2013 9:37 AM **To:** Conte, Richard; Khanna, Meena **Cc:** Trapp, James; Schroeder, Daniel; Dentel, Glenn; Cook, William; Raymond, William **Subject:** RE: Response to Request - Reg Process Outline - Seabrook ASR

Rich,

Seabrook's last update to its FSAR was November 17, 2011. NextEra must complete its current FSAR update <u>no</u> <u>later</u> than November 17, 2013. My understanding is that NextEra is currently working on an FSAR update and expects to submit it in the Spring 2013, which should be around May 2013.

John

From: Conte, Richard
Sent: Wednesday, February 06, 2013 9:15 AM
To: Khanna, Meena
Cc: Lamb, John; Trapp, James; Schroeder, Daniel; Dentel, Glenn; Cook, William; Raymond, William
Subject: RE: Response to Request - Reg Process Outline - Seabrook ASR

Thanks I incorporated you thought into the working group talking points; but I also have some questions.

There is no discussion about the applicability or use 50.55a, Codes and Standards. What happened to it?

The basis for FSAR update being 11/17/13 is not clearly stated; the outage was October 2012, 6 months from outage end is when FSAR update is needed ~5/1/2013.

There also is no discussion on how this relates to operability determination guidance – defacto design change – and the problematic issue that two PODs of varying quality have traversed several operating cycles.

No email response desired - just heads up on my questions. We can discuss this PM.

From: Khanna, Meena Sent: Tuesday, February 05, 2013 3:40 PM To: Conte, Richard; Cook, William; Raymond, William Cc: Lamb, John Subject: RE: Response to Request - Reg Process Outline - Seabrook ASR Importance: High

, Rich, Bill, and Bill,

I apologize for the delay in getting back to you regarding your requests related to a regulatory process for the Seabrook ASR issue. We held a meeting with Harold Chernoff, whereby he provided us with some recommendations with regards to your questions, which are outlined in the attachment. We will discuss this at tomorrow's meeting and can address any questions as well. Pls share with any others, as appropriate.

Thanks.

From:Raymond, WilliamSent:Tuesday, July 03, 2012 3:03 PMTo:Thomas, George; Sheikh, Abdul; Chaudhary, Suresh; Buford, AngelaCc:Conte, Richard; Cook, WilliamSubject:Calculation C-S-1-10168

#### George,

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Calculation C-S-1-10168, which updates the POD for the EOC buildings using the Interim Assessment assumptions on reduced shear and bond strength, is now posted to Certrec. Bill

From: Raymond, William Sent: Tuesday, July 03, 2012 2:43 PM To: Thomas, George; Sheikh, Abdul; Conte, Richard; Cook, William; Chaudhary, Suresh Cc: Buford, Angela Subject: RE: Mortar Bar Testing and Results

Agree, George, the standards are silent on alkali exhaustion. In those areas that had been chronically wet to allow ASR to advance to the state it was found in 2010, NextEra had hoped (outside chance) that the tests would show the alkali had been exhausted and thus the reaction had reached (or was reaching) an end point. This hope was not realized.

From: Thomas, George Sent: Tuesday, July 03, 2012 2:36 PM To: Sheikh, Abdul; Raymond, William; Conte, Richard; Cook, William; Chaudhary, Suresh Cc: Buford, Angela Subject: RE: Mortar Bar Testing and Results

Another clarification of point #3 made by Bill: The C1260 and C1293 tests are meant specifically to detect/screen for aggregate reactivity only – for the Seabrook case it confirms that the aggregate is reactive and gives a qualitative

assessment of residual reactivity by comparing results from the two types of samples used. These tests do not say —anything about alkali exhaustion in the concrete..

From: Sheikh, Abdul Sent: Tuesday, July 03, 2012 2:25 PM To: Thomas, George; Raymond, William; Conte, Richard; Cook, William; Chaudhary, Suresh Cc: Buford, Angela

Subject: RE: Mortar Bar Testing and Results

Bottom line on the test results is that there is a lot of expansion and reactivity left over the long term in the ASR affected concrete structures (cracked areas). This can continue with continuous ingress of ground water into the walls. The aggregates from the cracked area reached 0.10 limit in 7 days as compared to 5 days in the non cracked areas.

From: Thomas, George Sent: Tuesday, July 03, 2012 1:17 PM To: Raymond, William; Conte, Richard; Cook, William; Chaudhary, Suresh Cc: Buford, Angela; Sheikh, Abdul Subject: RE: Mortar Bar Testing and Results

Just a clarification/correction on Bill's email below: Reactive forms of silica needed for ASR comes from the aggregate. The alkalis (sodium hydroxide and potassium hydroxide) needed for ASR comes primarily from the cement. The aggregate could also contribute to this. In addition, moisture is needed for the ASR gel to expand and cause cracking – this moisture could come from ground water, rain, snow, humidity in the atmosphere, and water in the concrete itself. For the below-grade structures at Seabrook, it is primarily coming from ground water.

#### From: Raymond, William Sent: Tuesday, July 03, 2012 10:50 AM To: Conte, Richard; Cook, William; Chaudhary, Suresh Cc: Thomas, George; Buford, Angela; Sheikh, Abdul Subject: RE: Mortar Bar Testing and Results

#### Rich,

The file on Certrec is the test report prepared by SGH in Mass. I am not aware of any other assessment NextEra's may have regarding the results.

I think it is premature to say much more at ACRS other than the tests are done, the results indicate the structural concrete is still reactive, and NRC staff review of the matter is in progress.

Bill Cook - look at the last bullet of the conclusions from the SGH report....

 "the nonreacted concrete cores show no evidence of ASR in the field because the conditions of exposure are not conducive to initiating and sustaining ASR within the hardened concrete at that location."

This just reaffirms that reactive concrete without water (moisture) will not degrade due to ASR. A Root Cause Evaluation which does not identify ground water as causal would "miss the mark," as would an engineering "mindset" that fails to deal with continued exposure to groundwater as a problem for the structures long term serviceability.

Quick answers to your questions:

- 1) The silica comes from the cement; the alkali comes from the aggregate. There is a question as to how much alkali can be contributed by the groundwater for in-place structures.
- 2) We can pursue this with NextEra. I think the ASTM C1260 limitations were that the tests could produce false negative results. I have not heard that they can produce false positive results. If the concrete grows, it is reactive. If it does not expand in 16 days maybe the concrete reaction rate is slow enough that the expansion cannot be measured in 16 days.
- 3) The conclusion one can reach from the ASTM C1260 results is that the alkali in the concrete has not been exhausted and there is an expectation that the structures would continue to degrade from ASR in the continued presence of water (moisture).
- 4) The test continues by leaving the specimens immersed in the water bath and periodically measuring the expansion to determine whether the reaction rate is changing or approaching an end point. The test can continue until the specimens disintegrate.

We can follow this up more with NextEra during the week of July 16<sup>th</sup>.

Bill

From: Conte, Richard Sent: Tuesday, July 03, 2012 10:15 AM To: Raymond, William; Cook, William

Cc: Thomas, George; Sheikh, Abdul; Auluck, Rajender; Marshall, Michael; Chaudhary, Suresh; Buford, Angela; Cartwright, William

Subject: RE: Mortar Bar Testing and Results

Added Abdul and a few others. What should we say at ACRS, most likely nothing since the CAL says the test will be completed by June 30 which I think they did AND test results will be available to NRC July 30. Is what that is on Certrec their evaluation of the test results????

Lthink we still need to reconcile the test limits with conclusions being brought forward by NextEra.

Perhaps our contractor can give a perspective on all this. Perhaps he should pursue something with NextEra.

The contractor seems to have had experience with core sampling and large scale testing. It appears he has ASR experience also

First obvious questions:

- 1. Where is the Silica coming from, aggregate or groundwater or both.
- 2. What are the limitations of the test, we have stated previously this ST test gives misleading results the negative ones or the positive ones.
- 3. If no quantitative results can be achieved from this test, is the only conclusion being the reaction continues because of a continuous supply of alkali and silica and water.
- 4. How does one continue with this short term test.

From: Raymond, William Sent: Monday, July 02, 2012 4:03 PM To: Buford, Angela Cc: Conte, Richard; Thomas, George Subject: Mortar Bar Testing and Results

Angela,

The mortar bar tests are described in FP100734 which has been posted to Certrec.

The tests were completed over a 16-day period per ASTM C1260.

The test samples consisted of mortar bars constructed from "recovered" aggregate taken from Seabrook structures. The aggregates in **Mix A** samples were taken from cores removed from **structures impacted by ASR**.

The aggregates in Mix B samples were taken from cores removed from non-ASR impacted structures.

The test results after 16 days showed that samples from both mixes contain sufficient alkali for continued reactivity. There is little difference in reactivity of the concrete in any of the structures.

The ASTM C1260 testing continues on the samples to determine if an end state can be observed.

The results are copied below for your convenience:

- The average percentage of expansion data (relative to the zero reading) for all of the test specimens exceeds the 0.1% limit provided as a guideline in ASTM C1260 that represents the threshold for determining if an aggregate source contains potentially deleteriously expansive ASR aggregate.
- The slope of the expansion curves for each aggregate type (reacted and nonreacted) remains positive with no indication of approaching a condition of near zero (flat-line) expansion rate.
- There is no indication that potential for continued reactivity of the aggregate in either the reacted or nonreacted structures has been substantially lessened during service.
- Based on the plotted test data, the nonreacted aggregate (Mix B) exceeded the 0.1% limit after 5 days of exposure, while the reacted aggregate series did not exceed the limit after 7 days of exposure.
- Both aggregate sources contain reactive aggregate capable of contributing to longterm expansion.
- The test results indicate that the nonreacted concrete cores show no evidence of ASR in the field because the conditions of exposure are not conducive to initiating and sustaining of ASR within the hardened concrete at that location.

Bill

From:	Raymond, William
Sent:	Tuesday, July 03, 2012 3:09 PM
То:	Thomas, George
Cc:	Buford, Angela; Sheikh, Abdul; Conte, Richard; Cook, William; Chaudhary, Suresh
Subject:	RE: Mortar Bar Testing and Results

Got it, George. Thank you for the clarification. Bill

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From: Thomas, George Sent: Tuesday, July 03, 2012 3:05 PM To: Raymond, William Cc: Buford, Angela; Sheikh, Abdul; Conte, Richard; Cook, William; Chaudhary, Suresh Subject: RE: Mortar Bar Testing and Results

Bill, the C1260 and C1293 tests are meant to test only for potential aggregate reactivity and it is primarily the aggregates that were extracted from the cores. There are other tests for alkali content (water soluble alkali content test) and overall reactivity (expansion tests directly on cores removed). You can not get alkali exhaustion from the C1260 test where the test samples are itself actually immersed in NaOH solution (not water) at 100 F to accelerate the reaction – all it can achieve is exhaustion in aggregate reactivity.

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- Thanks.

From:	Conte, Richard
Sent:	Tuesday, March 26, 2013 11:45 AM
To:	Dentel, Glenn; Buford, Angela; Jennerich, Matthew; McKenna, Philip; Raymond, William; Cook, William; Trapp, James
Cc:	Screnci, Diane; Sheehan, Neil; Floyd, Niklas; Tifft, Doug; McNamara, Nancy; Chaudhary, Suresh
Subject:	FW: Summary of Telephone Conference Call Held on March 13, 2013, Between the Office of Nuclear Reactor Regulation, Office of Nuclear Regulatory Research, and Region I Concerning the Licensing Approach Pertaining to the Seabrook Station, Unit 1 Alkali Sili

Wow this got processed fast. It should NOT get attention tomorrow night since it is NOT publicly available.

This kind of lays out the direction we are headed when the CAL is closed.

But you never know that it might come up, so we should be prepared to answer.

#### From: Lee, Erika

Sent: Monday, March 25, 2013 4:23 PM

**To:** RidsRgn1MailCenter Resource; RidsNrrPMSeabrook Resource; RidsNrrLAABaxter Resource; RidsNrrDorlLpl1-2 Resource; RidsNrrDorlDpr Resource; RidsOgcMailCenter Resource; RidsNrrDlr Resource; Wentzel, Michael; Cunanan, Arthur; Morey, Dennis; McIntyre, David; Dacus, Eugene; Spencer, Michael; Raymond, William; Tifft, Doug; McNamara, Nancy; Sheehan, Neil; Screnci, Diane; Johnson, Jessica; Dentel, Glenn; McKenna, Philip; Jennerich, Matthew; Trapp, James; Conte, Richard; Cook, William

**Subject:** Summary of Telephone Conference Call Held on March 13, 2013, Between the Office of Nuclear Reactor Regulation, Office of Nuclear Regulatory Research, and Region I Concerning the Licensing Approach Pertaining to the Seabrook Station, Unit 1 Alkali Silica R

Date: March 20, 2013

Applicant: NextEra Energy Seabrook, LLC

Facility: Seabrook Station

Subject: Summary of Telephone Conference Call Held on March 13, 2013, Between the Office of Nuclear Reactor Regulation, Office of Nuclear Regulatory Research, and Region I Concerning the Licensing Approach Pertaining to the Seabrook Station, Unit 1 Alkali Silica Reaction Confirmatory Action Letter

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Open ADAMS P8 Document (Summary of Telephone Conference Call Held on March 13, 2013, Between the Office of Nuclear Regulation, Office of Nuclear Regulation, Office of Nuclear Regulatory Research, and Region I Concerning the Licensing Approach Pertaining to the..)

Erika Lee, Administrative Assistant U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Division of Operating Reactor Licensing Plant Licensing Branches LPL1-1 & LPL1-2 301-415-0373 erika.lee@nrc.gov