



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 18, 2014

Mr. Dean Curtland
Site Vice President
Seabrook Station
NextEra Energy
626 Lafayette Road
Seabrook, NH 03874

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE REVIEW OF
THE SEABROOK STATION LICENSE RENEWAL APPLICATION – SET 22
(TAC NO. ME4028)

Dear Mr. Curtland:

By letter dated May 25, 2010, NextEra Energy Seabrook, LLC submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew the Operating License NPF-86 for Seabrook Station, Unit 1, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

The request for additional information was discussed with Mr. Edward Carley, and a mutually agreeable date for the response is within 60 days from the date of this letter. If you have any questions, please contact me at 301-415-1427 or by e-mail at richard.plasse@nrc.gov.

Sincerely,

/RA by John Daily For)

Richard Plasse, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure:
Requests for Additional Information

cc w/encl: Listserv

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Dear Mr. Curtland:

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DATE	11/12/14	11/13/14	11/17/14	11/18/14

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SEABROOK STATION
LICENSE RENEWAL APPLICATION
REQUEST FOR ADDITIONAL INFORMATION SET 22

RAI 3.0.3.4-1

Background

By letter dated March 5, 2014, several aging management programs (AMPs) were revised to address loss of coating integrity. The definition of coatings that are within the scope of these changes was stated as follows:

All coatings applied to the internal surfaces of an in-scope component if its degradation could prevent satisfactory accomplishment of any of the functions identified under 10 CFR 54.4 (a)(1), (a)(2), or (a)(3). Service Level III (augmented) coatings are those: (a) Used in areas outside of the reactor containment whose failure could adversely affect the safety function of a safety-related SSC or, (b) Applied to the internal surfaces of in-scope components and whose failure could prevent satisfactory accomplishment of any of the functions identified under 10 CFR 54.4 (a)(3).

Issue

The staff noted that the term “areas outside of the reactor containment” could exclude coatings installed on the internal surfaces of in-scope piping, piping components, heat exchangers, and tanks that are located in containment. It is not clear whether there are any internally coated in-scope piping, piping components, heat exchangers, and tanks that are located in containment.

Request

State whether there are any internally coated in-scope piping, piping components, heat exchangers, and tanks that are located in containment, and if there are, state how loss of coating integrity will be managed for these components.

RAI 3.0.3.4-2

Background

By letter dated March 5, 2014, several AMPs were modified to state that, “[c]oatings specialists and inspectors will be qualified in accordance with American Society for Testing and Materials (ASTM).”

Issue

The staff lacks sufficient information to determine whether the coatings specialist and inspectors will be adequately qualified to conduct activities associated with coating integrity. The staff has currently only evaluated ASTM standards referenced in Regulatory Guide (RG) 1.54.

Request

State the specific ASTM standards that will be used to qualify coatings specialist and inspectors.

ENCLOSURE

RAI 3.0.3.4-3

Background

By letter dated March 5, 2014, several AMPs were modified to state that, prior to conducting coating inspections, the results of the previous two inspections and any repair activities will be reviewed.

Issue

The staff noted that, while it is clear that a coatings specialist will review the inspection results prior to the next inspection, it is not clear whether this individual will prepare the post-inspection report for the prior inspections.

Request

State the qualification level of the individual who prepares the post-inspection report.

RAI 3.0.3.4-4

Background

By letter dated March 5, 2014, the acceptance criteria for the results of inspections associated with loss of coating integrity were added to several AMPs. Two of these are as follows:

- Blisters are evaluated by a coatings specialist and are limited to blisters that are completely surrounded by sound coating material bonded to the surface. Inspections of the base material will be conducted in the vicinity of the blister in order to determine if unanticipated corrosion has occurred.
- “Adhesion values provide reasonable assurance that the coating will remain bonded to the substrate as evaluated by the coating specialist.”

Issue

The staff noted that the criteria for accepting a blister for continued service does not state whether the coating specialist will consider the potential effects of flow blockage and degradation of the base material beneath the blister. In addition, the criterion for adhesion testing results does not state how reasonable assurance that coatings will remain bonded to the substrate will be determined.

Request

State whether the potential effects of flow blockage and degradation of the base material beneath the blister will be considered in an accept-as-is disposition and how reasonable assurance that coatings will remain bonded to the substrate will be determined.

RAI 3.0.3.4-5

Background

By letter dated March 5, 2014, the “corrective actions” program elements of several AMPs were revised to state that indications will be entered into the corrective action program.

Issue

The staff noted that the programs do not state that coatings that do not meet acceptance criteria will be repaired or replaced and what testing will be conducted subsequent to the repair or replacement of coatings.

Request

State whether coatings that do not meet acceptance criteria will be repaired or replaced, and what testing will be conducted subsequent to the repair or replacement of coatings.

RAI 3.0.3.4-6

Background

By letter dated March 5, 2014, License Renewal Application (LRA) Sections A.2.1.11, Open-Cycle Cooling Water System, A.2.1.16, Fire Water System, A.2.1.18, Fuel Oil Chemistry, and A.2.1.25, Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components were revised to state that the programs will manage loss of coating integrity of Service Level III (augmented) internal coatings.

Issue

The revised updated final safety analysis report (UFSAR) sections do not provide a summary description of the aspects of the programs associated with managing loss of coating integrity, as required by 10 CFR 54.21(d). The staff noted that the changes did not include any statements related to: (a) how coatings will be inspected; (b) the testing that will be conducted for coatings that are determined to not meet the acceptance criteria; and (c) the training and qualification of individuals involved in coating/lining inspections in the UFSAR supplement updates.

Request

State the basis for why LRA Sections A.2.1.11, A.2.1.16, A.2.1.18, and A.2.1.25 provide an adequate summary description of the activities to manage loss of coating integrity for in-scope piping, piping component, heat exchanger, and tank internal coatings. Alternatively, revise LRA Sections A.2.1.11, A.2.1.16, A.2.1.18, and A.2.1.25 to provide a summary of how the programs manage this aging effect.

RAI B.2.1.25-4

Background

LRA Supplement 33, dated March 5, 2014, revised the first full paragraph on LRA page B-141 to state that “approximately” 20 percent or a maximum of 25 components of each material, environment, and aging effect (MEA) combination will be inspected during each 10-year period of extended operation. LRA Section A.2.1.25 states that a “representative” sample of MEA combinations will be inspected during each 10-year period of extended operation.

Issue

It is unclear what is the minimum sample size to be inspected in the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program. The UFSAR supplement (A.2.1.25) states that a “representative” sample will be inspected and the description of the AMP (B.2.1.25) states that “approximately” 20 percent of each MEA combination will be inspected.

The definitions of “representative” and “approximately” in the context of minimum sample size are unclear.

Request

Provide clarification on the minimum sample size to be inspected in the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program. Specifically, describe:

- what “approximately 20%” relates to numerically, as used in LRA Section B.2.1.25 to describe the population being inspected, and
- what “representative sample” relates to numerically, as used in LRA Section A.2.1.25 to describe the population being inspected.

RAI B.2.1.16-4

Background

LRA Supplement 33, dated March 5, 2014, states that, “[a] 3-year flow test is conducted for flow verification of the fire protection water system on a sufficient number of hydrants to determine the capacity of the system in the area tested.”

Issue

Based on the statement, “capacity of the system in the area tested,” [emphasis added by the staff] it is not clear to the staff that the underground piping system is tested to the worst-case design flow conditions. It is also not clear to the staff that the flow rates during the tests will be consistent enough to trend the friction loss characteristics of the underground piping system.

Request

State whether the underground piping system will be tested to the worst-case design flow conditions and the basis for why the flow rates during the tests are consistent enough to be able to trend the friction loss characteristics of the underground piping system.

RAI B.2.1.16-5

Background

LRA Supplement 33, dated March 5, 2014, states that internal inspections will be conducted on the fire protection water storage tanks (FWSTs) every five years.

Issue

It is not clear to the staff whether the additional tests and inspections cited in NFPA 25 Section 9.2.7 will be conducted if pitting and general corrosion to below nominal wall depth and any coating failure in which bare metal is exposed (reference Table 4a footnote 4) is detected.

Request

State whether the additional tests and inspections specified in National Fire Protection Association (NFPA) 25 Section 9.2.7 will be conducted if degradation described in Table 4a footnote 4 is detected.

RAI B.2.1.16-6

Background

LRA Supplement 33, dated March 5, 2014, states that, “[w]ater spray fixed systems strainers are cleaned every five years during the wet sprinkler alarm valve inspection/maintenance, deluge or sprinkler flooding valve inspection/maintenance, and deluge or sprinkler multimatic valve inspection/maintenance.”

Issue

The staff noted that LR-ISG-2012-02, “Aging Management of Internal Surfaces, Fire Water Systems, Atmospheric Storage Tanks, and Corrosion Under Insulation,” AMP XI.M27 Table 4a, “Fire Water System Inspection and Testing Recommendations,” states that strainers should be inspected every refueling outage interval and after each system actuation. The staff also noted that NFPA 25 Section 10.2.1.7 allows mainline strainer inspections to be conducted every 5 years. It is not clear to the staff whether the term “inspection” in the LRA supplement means flow test or a visual inspection of some nature and whether “maintenance” means any opening of the system such that the strainers are accessible.

Request

Regarding LRA Supplement 33, state whether the term “inspection” includes flow tests and whether “maintenance” means any opening of the system such that the strainers are accessible.

RAI B.2.1.16-7

Background

LRA Supplement 33, dated March 5, 2014, states that, “[a]n Open Head Spray Nozzle Air Flow Test is performed every three years to verify that the open heads and branch lines on the deluge system are free of debris and not blocked. This is done by connecting the selected deluge system to the service air system and observing air flow through each sprinkler head.”

Issue

The staff noted that NFPA 25 Section 13.4.3.2.2.4 allows deluge valve flow test frequencies to not exceed three years; however, LR-ISG-2012-02 AMP XI.M27 Table 4a states that water spray fixed system operational tests should be conducted on a refueling outage interval.

Request

State the basis for conducting deluge valve flow testing every 3 years instead of on a refueling outage interval.

RAI B.2.1.16-8

Background

LRA Supplement 33, dated March 5, 2014, states that the Fire Water System Program “will be enhanced to conduct an inspection of piping and branch line conditions every five years by opening a flushing connection at the end of one main and by removing a sprinkler toward the end of one branch line for the purpose of inspecting for the presence of foreign organic and inorganic material....”

Issue

The staff noted that NFPA 25 Section 14.2.2 specifies that, on an alternating schedule, an internal inspection of every other wet pipe system in buildings with multiple wet pipe systems should be conducted every five years. The staff lacked sufficient information to complete its evaluation of the enhancement because it is not clear whether there are multiple wet pipe systems in any of the structures containing in-scope fire water systems.

Request

State if there are multiple wet pipe systems in any of the structures containing in-scope fire water systems and, if there are, state the basis for why testing is not conducted on every other system every five years.

RAI B.2.1.16-9

Background

LRA Supplement 33, dated March 5, 2014, states that the plant-specific installation specification for the fixed fire suppression system included a requirement that, “all piping shall be pitched to permit complete drainage of the system. Drain valves shall be provided at all low points of the system.” Based on this, it was stated that no changes were required to address normally-dry pipe that is periodically wetted where piping segments allow water to collect.

Issue

The staff noted that despite appropriate construction specifications, field installation can result in deviations. In addition, during the first few operational cycles of systems (e.g., system flow), minor changes in pipe elevations can occur. It is not clear to the staff how it was confirmed that there were no piping segments that could allow water to collect in the fire water normally-dry but periodically-wetted piping.

Request

State how it was confirmed that there were no piping segments that could allow water to collect in the fire water normally-dry but periodically-wetted piping.

RAI B.2.1.16-10

Background

The LRA Supplement 33, dated March 5, 2014, changes to the “acceptance criteria” program element of the Fire Water System Program did not address all the recommendations in the “acceptance criteria” program element of LR-ISG-2012-02, which states in part that, if foreign organic or inorganic material sufficient to obstruct piping or sprinklers is detected, the material should be removed and its source determined and corrected.

Issue

It is not clear to the staff whether an exception was taken to this portion of the recommendations in the “acceptance criteria” program element of LR-ISG-2012-02.

Request

State what actions will be taken if foreign organic or inorganic material sufficient to obstruct piping or sprinklers is detected.

RAI B.2.1.16-11

Background

As amended by letter dated March 5, 2014, LRA Section B.2.1.16 states an enhancement to the “detection of aging effects” program element as follows:

The Seabrook Station Fire Water System Program will be enhanced to include the performance of periodic visual inspection or volumetric inspection, as required, of the internal surface of the fire protection system upon each entry to the system for routine or corrective maintenance to evaluate wall thickness and inner diameter of the fire protection piping ensuring that corrosion product buildup will not result in flow blockage due to fouling. Where surface irregularities are detected, follow-up volumetric examinations are performed. This inspection will be performed no earlier than 10 years before the period of extended operation.

Issue

The staff noted that the last sentence of this enhancement had been revised by letter dated November 15, 2010, to state, “[t]hese inspections will be performed within ten years prior to the period of extended operation.” It is not clear to the staff: (a) why the sentence reverted to the original wording of the enhancement; (b) why the term “This” inspection was used when the enhancement implies that periodic inspections will be conducted; and (c) if the intent is to conduct periodic inspections in the 10-year period prior to the period of extended operation and during the period of extended operation, why this sentence does not refer to the inspections “commencing” during the 10-year period prior to the period of extended operation.

Request

Clarify the intent and the wording of Enhancement No. 3 and Commitment No. 11.

RAI B.2.1.17-6

Background

As revised by LR-ISG-2012-02, SRP-LR Table 3.0-1 states that external visual examinations are sufficient to monitor the degradation of caulking and sealant when supplemented with physical manipulation. By letter dated December 17, 2010, the UFSAR Supplement (LRA Sections A.2.1.17) was revised to include visual inspection of caulking and sealant, in response to RAI B.2.1.17-2. The Aboveground Steel Tanks Program (LRA Section B.2.1.17) was also revised to include the tactile examination of caulking and sealant, in response to RAI B.2.1.17-3.

Issue

The UFSAR Supplement (LRA Sections A.2.1.17) does not specifically state that visual examinations of caulking and sealant will be augmented by physical manipulation.

Request

Provide the justification for not augmenting visual examinations of caulking and sealant with physical manipulation.

RAI B.2.1.17-7

Background

By letter dated March 5, 2014, the Aboveground Steel Tanks Program (LRA Section B.2.1.17) was revised in response to LR-ISG-2012-02. Enhancement 1 was revised to include additional in-scope aboveground metallic tanks. Enhancement 2 revised the implementing procedures of the Aboveground Steel Tanks Program to be consistent with the staff's revised guidance in Table 4a, Tank Inspection Recommendations of LR-ISG-2012-02.

Issue

The enhancements to the Aboveground Steel Tanks Program are not reflected in the applicant's commitment (Commitment No. 12) to implement the AMP. Furthermore, it is unclear what requirements the current commitment (Commitment No. 12) is referring to when it states "components and aging effects required by the Aboveground Steel Tanks" Program.

Request

Describe how the Enhancements to the Aboveground Steel Tanks Program are captured in a commitment. Clarify what requirements are being referenced in Commitment No.12.

RAI B.2.1.24-3

Background

By letter dated March 5, 2014, NextEra Energy (the applicant) provided its response to NRC License Renewal Interim Staff Guidance (LR-ISG) No. LR-ISG-2012-02, "Aging Management of Internal Surfaces, Fire Water Systems, Atmospheric Storage Tanks, and Corrosion Under Insulation" (Agencywide Documents Access and Management System (ADAMS) Accession Number ML13227A367). In this letter the applicant amended the External Surfaces Monitoring Program (LRA Section B.2.1.24) to include aging management bases for managing loss of material due to corrosion under insulation and cracking due to stress corrosion cracking for insulated components at the facility. The applicant also amended UFSAR Supplement Table A.3 to include LRA Commitment No. 78 to state that the AMP will be enhanced to include periodic inspections of in-scope insulated components for possible corrosion under insulation and that the enhancement of the program will be completed prior to the period of extended operation.

Issue

In the applicant's letter of May 5, 2014, the applicant only amended the program description of the External Surfaces Monitoring Program to include the details and basis for managing loss of material due to corrosion under insulation at the facility. The applicant did not incorporate this detailed basis into the UFSAR Supplement for the AMP or into the provision of LRA Commitment No. 78.

Request

Justify why the basis and programmatic criteria for managing loss of material due to corrosion under insulation in the revised description for LRA AMP B.2.1.24, "External Surfaces Monitoring," have not been incorporated into a revision of either LRA UFSAR Supplement Section A.2.1.14, "External Surfaces Monitoring," or LRA Commitment No. 78, which was provided in the letter of March 5, 2014.

RAI B.2.1.11-3

Background

By letter dated March 5, 2014, NextEra Energy (the applicant) provided its response to NRC License Renewal Interim Staff Guidance (LR-ISG) 2012-02, "Aging Management of Internal Surfaces, Fire Water Systems, Atmospheric Storage Tanks, and Corrosion Under Insulation" (ADAMS Accession Number ML13227A361). In this letter, the applicant amended the Aging Management Review (AMR) tables for the auxiliary (Aux) systems and steam and power conversion (SPC) systems to include new AMR items for insulated piping and fitting components which are exposed to either external condensation, external uncontrolled indoor air, or external outdoor air environmental conditions.

Issue

Part 1 – In the letter of March 5, 2014, the applicant amended LRA Table 2.3.3-4 for the chlorination system to include "Insulated Piping and Fittings" as a new, in-scope component type for the system. However, the applicant did not amend LRA Table 3.3.2-4, Summary of Aging Management Evaluation – Chlorination System, to include applicable AMR items for insulated components in the chlorination system.

Part 2 – In the letter of March 5, 2014, the applicant amended LRA Table 2.3.4-2 for the auxiliary steam condensate system and LRA Table 2.3.4-4 for the circulating water system to include "Insulated Piping and Fittings" as a new, in-scope component type for the systems. However, the applicant did not amend LRA Table 3.4.2-2, Summary of Aging Management Evaluation – Auxiliary Steam Condensate System, and LRA Table 3.4.2-4, Summary of Aging Management Evaluation – Circulating Water System, to include applicable AMR items for insulated components in the systems.

Request

Part 1 – Provide your basis (i.e., justify) for not amending LRA Table 3.3.2-4, Summary of Aging Management Evaluation – Chlorination System, to include applicable AMR items for insulated piping and fitting components in the chlorination system. If it is determined that LRA Table 3.3.2-4 should have been amended to include applicable AMR items for insulated piping and fittings in the chlorination system, identify: (a) the material(s) of fabrication and environment(s) for the insulated piping and fittings in the chlorination system, (b) the aging effects that are applicable to the material-environment combinations for insulated piping and fittings in the system, and (c) the AMP that will be used to manage these aging effects during the period of extended operation. Amend LRA Table 3.3.2-4 accordingly.

Part 2 – Provide your basis (i.e., justify) for not amending LRA Table 3.4.2-2, Summary of Aging Management Evaluation – Auxiliary Steam Condensate System, and LRA Table 3.4.2-4, Summary of Aging Management Evaluation – Circulating Water System, to include applicable AMR items for insulated piping and fitting components in the systems. If it is determined that LRA Tables 3.4.2-2 and 3.4.2-4 should have been amended to include applicable AMR items for insulated piping and fittings in the auxiliary steam condensate system and the circulating water system, identify: (a) the material(s) of fabrication and environment(s) for the insulated piping and fittings in systems, (b) the aging effects that are applicable to the material-environment combinations for insulated piping and fittings in the systems, and (c) the AMP that will be used to manage these aging effects during the period of extended operation. Amend LRA Tables 3.4.2-2 and 3.4.2-4 accordingly.

RAI B.2.1.11-4

Background

By letter dated March 5, 2014, Seabrook provided its response to License Renewal Interim Staff Guidance (LR-ISG)-2012-02, "Aging Management of Internal Surfaces, Fire Water Systems, Atmospheric Storage Tanks, and Corrosion Under Insulation." With regard to recurring internal corrosion (RIC), the response states that loss of material due to RIC has been detected in the cement lined carbon steel piping in the service water system (SWS) and that this aging effect is being managed by LRA AMP B.2.1.11, Open-Cycle Cooling Water System Program. With regard to the adequacy of augmented inspections, the response states that visual inspections of the pipe liner have enabled identification of under-liner corrosion due to liner degradation or defects, and once located, actual wall loss can be evaluated using ultrasonic testing (UT). With regard to decision points where increased inspections would be implemented, the response states that maintenance strategies are assessed to determine if changes are warranted following the identification of any new degradation.

Issue

The response to LR-ISG-2012-02 states that the amount of wall loss in a component exhibiting signs of corrosion can be evaluated through UT wall thickness measurements. However, the response does not firmly establish that a component will be monitored for wall loss if visual inspections detect signs of corrosion. In addition, the response does not indicate whether the program will perform expanded visual inspections in other portions of the SWS if new degradation is detected in a SWS component. The applicant's basis also does not indicate the "acceptance criterion" that will be applied to a component's wall loss assessment if UT sizing measurements indicate that a corroded SWS piping or fitting component is thinning over time.

Request

Part 1 – Clarify whether the "monitoring and trending" element of the Open-Cycle Cooling Water Program will initiate subsequent UT monitoring activities (for wall thickness measurements) if corrosion (including RIC) is detected in either a lined or unlined SWS piping, and clarify whether this has been established in the plant procedures for implementing the visual examinations of the internal surfaces of the SWS piping under the Open-Cycle Cooling Water Program. If not, justify why the "monitoring and trending" element of the AMP would not initiate UT monitoring to quantify the degree of wall loss if corrosion (including RIC) is detected in a lined or unlined SWS piping component.

Part 2 – Clarify whether the implementation of the Open-Cooling Water Program will initiate expanded visual examinations to other portions of the SWS if corrosion (including RIC) is detected in a specific SWS piping or fitting location. If so, clarify and justify the sample expansion criteria that will be implemented in accordance with the AMP. Otherwise, justify the basis for omitting applicable sample expansion criteria in the AMP if sample expansion criteria are not included in the "detection of aging effects" or "monitoring and trending" element bases for the AMP. In addition, clarify and justify the "acceptance criterion" that will be used to initiate further corrective actions if corrosion (including RIC) is detected in a specific SWS piping or fitting component and wall thinning of the component has been observed as part of the program's monitoring activities.

Letter to D. Curtland from R. Plasse dated November 18, 2014

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