

From: [Justin Poole \(He/Him\)](#)
To: [Levander, Matthew](#); [Phillabaum, Jerry](#)
Cc: [Hipo Gonzalez](#); [Mack, Jarrett](#)
Subject: Request for Additional Information Regarding Relief Request 4RA-22-001 (L-2022-LLR-0074)
Date: Wednesday, January 11, 2023 2:31:00 PM
Attachments: [L-2022-LLR-0074 Request for Additional Information for RR 4RA-22-001.pdf](#)

Matt/Jerry,

By letter dated October 26, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22300A026), NextEra Energy Seabrook, LLC (the licensee) submitted relief request (RR) 4RA-22-001 to utilize an alternative minimum preheat temperature during temper bead welding to that required by American Society of Mechanical Engineers (ASME) Code Section XI, IWA-4633.1(d) and to use an alternative nondestructive examination (NDE) technique to that required by ASME Code, Section XI, IWA 4634.1(b) when implementing a repair to replace steam generator lower head drain line nozzles. In reviewing the submitted information, the U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is necessary to complete its review.

On January 6, 2023, the NRC staff sent the licensee DRAFT RAIs to ensure that the questions are understandable, the regulatory basis is clear, there is no proprietary information contained in the RAIs, and to determine if the information was previously docketed. On January 11, 2023, the licensee notified the NRC staff that a clarification call was not required. The licensee requested a response date of 30 days from the date of this email. The NRC staff informed the licensee that this timeframe is acceptable. The attached is the final version of the RAIs. These RAIs will be put in ADAMS as a publicly available document.

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REQUEST FOR ADDITIONAL INFORMATION
RELIEF REQUEST 4RA-22-001 FOR USE OF AN ALTERNATIVE
FOR MAINTAINING A MINIMUM PREHEAT TEMPERATURE
NONDESTRUCTIVE EXAMINATION TECHNIQUE

NEXTERA ENERGY SEABROOK, LLC

SEABROOK STATION, UNIT NO. 1

DOCKET NO. 50-443

By letter dated October 26, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22300A026), NextEra Energy Seabrook, LLC (the licensee) submitted relief request (RR) 4RA-22-001 to utilize an alternative minimum preheat temperature during temper bead welding to that required by American Society of Mechanical Engineers (ASME) Code Section XI, IWA-4633.1(d) and to use an alternative nondestructive examination (NDE) technique to that required by ASME Code, Section XI, IWA-4634.1(b) when implementing a repair to replace steam generator lower head drain line nozzles.

Request for Additional Information (RAI) for 4RA-22-001

In the licensee's relief request under "Proposed Alternative and Basis for Use," it states that as an alternative to ASME Code Section XI, IWA-4633.1(d), which requires a maintenance of a 350°F preheat during the entirety of the temper bead welding process, the licensee is proposing to reduce the preheat temperature to not less than 300°F when performing progressive dye penetrant testing (PT) for each of the three temper bead welding layers. Once each PT is completed, the licensee will raise preheat temperature back to 350°F, consistent with the requirements of ASME Code, Section XI, and soak for 15 minutes before commencing with the next temper bead welding layer.

RAI-1

Please identify how the area that will undergo a PT will have the minimum preheat of 300°F maintained uniformly throughout the PT process. In addition, please identify the method for fully restoring the preheat temperature from 300°F to 350°F uniformly. It is stated in 4RA-22-001 under "Impracticality of maintaining 350°F preheat," that the use of heating machines may exceed 350°F in several locations by several degrees.

RAI-2

Please define the acceptance criteria which is to be used for the PT examination in lieu of the required ultrasonic testing (UT) examination.