



August 26, 2014
SBK-L-14153
Docket No. 50-443

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Seabrook Station

NextEra Energy Seabrook, LLC's Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012 (ML12054A736)
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012 (ML12229A174)
3. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012 (ML12242A378)
4. NextEra Energy Seabrook, LLC Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, (Order Number EA-12-049), dated October 26, 2012 (ML12311A013)
5. NextEra Energy Seabrook, LLC Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, (Order Number EA-12-049), dated February 26, 2013 (ML13063A438)
6. NextEra Energy Seabrook, LLC First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, (Order Number EA-12-049), dated August 28, 2013 (ML13247A178)
7. NextEra Energy Seabrook, LLC Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, (Order Number EA-12-049), dated February 27, 2014 (ML14064A188)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to NextEra Energy Seabrook, LLC (NextEra Energy Seabrook). Reference 1 was immediately effective and directs NextEra Energy Seabrook to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the NextEra Energy Seabrook initial status report regarding mitigation strategies. Reference 5 provided the NextEra Energy Seabrook overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. Reference 6 provided the first six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. Reference 7 provided the second six-month status update. The purpose of this letter is to provide the third six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments.

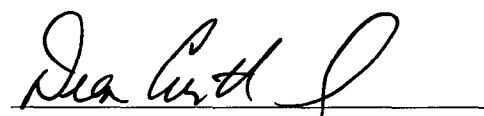
If you have any questions regarding this report, please contact Mr. Michael Ossing, Licensing Manager, at (603) 773-7512.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 26, 2014.

Sincerely,

NextEra Energy Seabrook, LLC

A handwritten signature in black ink, appearing to read "Dean Curtland", is written over a horizontal line.

Dean Curtland
Site Vice President

cc: NRC Region I Administrator
J.G. Lamb, NRC Project Manager, Project Directorate 1-2
NRC Senior Resident Inspector
Director, Office of Nuclear Reactor Regulation
Ms. Jessica A. Kratchmann, NRR/JLD/PMB, NRC
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Enclosure to SBK-L-14153

NextEra Energy Seabrook, LLC's Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

1 Introduction

NextEra Energy Seabrook, LLC (Seabrook) developed and submitted an Overall Integrated Plan (Reference 1) in response to NRC Order EA-12-049. The Integrated Plan describes Seabrook's proposed diverse and flexible coping strategies (FLEX). This status report provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation, if any.

2 Milestone Accomplishments

The following milestone has been completed since the submittal of the Overall Integrated Plan:

- Submit first 6 month status report
- Submit second 6 month status report
- Submit third 6 month status report

3 Milestone Schedule Status

The following provides an update to Attachment 2 of the Seabrook Overall Integrated Plan (Reference 1). The table includes the current status of each item and whether the expected completion date has changed. As noted in the original station submittal these dates are planning dates which are subject to change as design and implementation details are developed.

The following milestone target completion dates have been adjusted or added:

In the submittal of the Overall Integrated Plan in February 2013, Seabrook included Westinghouse SHIELD® low leakage RCP seals in all 4 RCPs as a backup strategy against significant RCS leakage to Containment. Seabrook intends to replace all 4 RCP seals with the SHIELD® seal technology in October 2015 during refueling outage 17. Revised milestone target completion dates do not currently impact Seabrook's full compliance date.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit Overall Integrated Implementation Plan	February 2013	Complete	N/A
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	N/A
Update 2	Feb 2014	Complete	N/A
Update 3	Aug 2014	Complete	N/A
Update 4	Feb 2015	Not Started	N/A
Update 5	Aug 2015	Not Started	N/A
Prepare engineering change packages for SEPS missile barrier and RCP low leakage seals (if necessary)	December 2014	Missile barrier design and RCP low leakage seals design both in development	N/A
Prepare bid for construction of SEPS missile barrier	March 2015	In Progress	N/A
Install RCP shutdown seals in four pumps in refueling outage #17	April 2014	Contract for RCP low leakage seals awarded	October 2015
Construct SEPS missile barrier	December 2014	Not Started	April 2015
Revise / develop procedures based upon approved strategies and engineering implementation packages	December 2014	Working	N/A
Develop required training for station staff based upon draft procedure changes and engineering change packages.	December 2014	Not Started	N/A

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Procure SEPS / portable equipment refueling trailer	December 2014	Design modification in progress	N/A
Submit 4 th 6-month status report to NRC	February 2015	Not Started	N/A
Develop PMs for refueling trailer	March 2015	Not Started	N/A
Store refueling trailer in Service Water Pump house	June 2015	Working	N/A
Off-site resources implementation site – RRC operational fall 2015	June 2015	Working	N/A
5 th and final 6-month status report to NRC	August 2015	Not Started	N/A
Conduct walkthroughs / demonstrations of portable equipment connection points	August 2015	Working	N/A
Implement training for station staff	September 2015	Not Started	N/A
Install four RCP shutdown seals in Refueling Outage #17	October 2015	Working	N/A
Final implementation – Order full compliance letter to NRC	November 2015	Not Started	N/A

4 Changes to Compliance Method

Seabrook has received feedback in the form of NRC audit questions and subsequent teleconferences with NRC Staff reviewers. The NRC's Interim Staff Evaluation (ISE) was also received. As details are developed, additional information will be uploaded to ePortal for NRC staff review as part of the audit process.

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Seabrook currently expects to comply with the order implementation date and no relief/relaxation is required at this time. Should the NRC staff /ISE require significant changes to the strategies defined in the Overall Integrated Plan, it may be necessary for Seabrook to request relief/relaxation at some time in the future.

6 Open Items from Overall Integrated Plan and NRC Interim Staff Evaluation /TER

The following Table provides a summary of the Pending Items documented in the Overall Integrated Plan:

	Overall Integrated Plan Pending Actions	Status
1	Revise ECA-0.0 to include a step to determine if an extended loss of offsite power event is in progress. This determination will delineate future procedural strategies and transitions.	In Progress
2	Revise ECA-0.0, Attachment 'A' to include a Table of loads for an extended loss of offsite power event or create a new Attachment with this information.	In Progress
3	A seismic evaluation will be conducted on the connections that penetrate the upper half of the CST to determine if Seabrook can take credit for the entire tank volume for Phase 1 & 2 event coping.	Complete, no credit will be taken for the non-seismic volume in the CST
4	Revise ECA-0.0 or ES-0.1 to add a step to manually shutdown the motor-driven EFW pump if the TDEFW pump is running satisfactorily.	Not Started
5	Add an Attachment to ES-0.2, ES-0.3 and ES-0.4 that provides a Table of electrical loads for responding to an extended loss of offsite power event.	Not Started
6	Develop a SEPS genset refueling strategy from 1) an offsite supplier outside a 25 mile radius from the station (primary strategy), and 2) the EDG fuel oil storage tanks using a refueling trailer stored in the SW Pumphouse (backup strategy). This strategy will	In Progress

	Overall Integrated Plan Pending Actions	Status
	include provisions for refueling within 24 hours in the event that only a single SEPS is functional.	
7	Revise ES-0.2, ES-0.3, and ES-0.4 to include a step for implementation of a SEPS genset refueling strategy.	Not Started
8	Develop a FSG for refueling SEPS from the EDG fuel oil storage tanks using a portable refueling trailer. Utilize the information contained in existing procedure OS1061.02, 'Receipt of SEPS Fuel Oil', for development of the FSG.	In Progress
9	Revise ES-0.2, ES-0.3, and ES-0.4 to include direction for connecting the backup diesel-driven air compressor to the Service Air system to restore Instrument Air system pressure.	Not Started
10	Develop required Preventive Maintenance actions and Surveillance test procedures for the refueling trailer to be procured and stored in the Service Water Pumphouse.	In Progress
11	Revise OS1246.01, 'Loss of Offsite Power - Plant Shutdown', to address a reactor de-fueled condition ('Mode 7'). In that case restoration of spent fuel pool cooling is paramount as opposed to restoration of RHR cooling.	Not Started
12	Conduct an Engineering Evaluation to determine if the existing hurricane enclosures for the SEPS gensets provide adequate missile protection. If protection is not adequate, develop a design change (EC) to add missile protection for the SEPS gensets.	In Progress
13	Evaluate the 'seismic robustness' of SEPS and determine if enhancements are needed with respect to the new Ground Motion Response Spectrum (GMRS) data for the site. This data will not be available until the seismic hazard re-evaluation is conducted in accordance Recommendation 2.1 of the RFI letter.	Complete

	Overall Integrated Plan Pending Actions	Status
14	Once the site flooding re-evaluation is completed in accordance with Recommendation 2.1 of the RFI letter, determine if additional flood protection is necessary for SEPS.	Not Started
15	Formalize the Engineering assessment of ELAP load capacity for a single SEPS genset and modify procedural guidance in the applicable EOPs and AOPs, as necessary.	In Progress
16	Evaluate the impact of missile protection barriers that may be installed to protect the SEPS gensets on the capability to implement the snow removal plan and revise the plan as necessary.	In Progress
17	Determine if a quantity of diesel fuel will be provided from the Regional Response Centers along with requested Phase 3 portable equipment. If not, establish a contract with a fuel supplier outside a 25 mile radius from the plant to provide fuel within 48 hours of a BDBEE.	In Progress
18	Develop a FSG for staging and deployment of Phase 3 equipment from the RRCs into the Protected Area.	In Progress
19	Develop a FSG for connecting the 2MW generators from the RRC to 4.16 KV Emergency Busses E5 and E6.	In Progress
20	Develop a FSG for refueling the RRC generators or incorporate this action into the SEPS refueling FSG.	In Progress
21	Implement low leakage RCP seals on all four RCPs as a backup strategy to minimize RCS leakage into Containment.	All four seals are planned to be replaced with the low leakage seal design in October 2015.
22	Based on PWROG guidance, determine if new FSGs are required that incorporate the existing guidance provided in SAG-1, 'Inject to the SGs', and SAG-3, 'Inject to the RCS' or whether transition points to these two SAMGs should be added to the applicable EOPs.	Complete, new FSGs are being developed for Steam Generator and RCS injection in the event the SEPS are unavailable.

	Overall Integrated Plan Pending Actions	Status
23	Develop a method for obtaining local readings for the 12 critical parameters identified on page 12 of 60 of the Integrated Plan and include in site procedures as appropriate.	In Progress

7 Interim Staff Evaluation Open/Confirmatory Item Status

Open/Confirmatory Item	Status
3.2.4.8.A Verify that the enclosure for the SEPS DGs and switchgear SEP-SWG-1 provides sufficient protection of the equipment from seismic events and wind driven missiles.	<p>The current SEPS environmental enclosures are non-safety related structures but are designed for a sustained wind loading of 120 mph which exceeds the UFSAR value of 110 mph. The two SEPS genset enclosures, switchgear enclosure and associated transformers will be further protected from both tornado and hurricane missiles by a steel frame structure attached to the existing Seismic Class I cooling tower building with steel grating panels and designed for seismic loading.</p> <p>The missile shield will also be designed for a 110 mph sustained wind load. The missile shield will provide protection from the full spectrum of UFSAR missiles, but will be based on a tornado wind speed of 200 mph and hurricane gust of 180 mph. These wind speed values differ from the UFSAR design, but are consistent with the current guidance found in the applicable Regulatory Guides for maximum wind gusts. Specifically, a tornado wind speed of 200 mph is shown in R.G. 1.76 Figure 1 for Region II. The peak hurricane wind gust for the Seabrook location shown on Figure 3 of R.G. 1.221 is 180mph. The corresponding missile velocities will be calculated consistent with the UFSAR missile spectrum.</p>

	<p>The SEPS exhaust pipes will be seismically mounted and protected from missiles until they exit the missile shield. At this point a blowout disk or open connection will be installed to protect against over pressure if evaluation shows potential for excessive backpressure from postulated crimping of the piping above the shield.</p> <p>The SEPS was installed originally as a non-seismic non-nuclear safety system. SEPS engines will be upgraded to meet the new EPRI GMRS for seismic. This is based on a seismic fragility analysis performed in 2012, which concluded that additional hold down bolts will be required for the engines and associated accessories, but modification of the gensets themselves was not required. To meet the augmented/expedited approach evaluation methodology, the SEPS hold down bolts will be designed to meet a bounding spectrum of the new EPRI GMRS and the existing SSE. Seismic design for the missile shield will be to the new GMRS, but additionally will remain functional for the SSE.</p>
<p>3.1.1.1.A Protection of FLEX equipment from seismic and high wind hazards – Confirm that the PDDPs and hose trailers will be adequately protected from seismic and high wind hazards.</p>	<p>One B5b pump (PDDP) will continue to be stored in its current structure located in the “A” parking lot outside the protected area. The associated hose and fittings are provided on a separate trailer stored in the same structure. This structure provides weather protection including high and low temperature conditions and is above the design basis flood elevation. Modification consisting of tie down anchors will be added to protect the shelter from high winds and seismic.</p> <p>The second PDDP pump with associated hose and fittings and one new RCS high pressure makeup pump (PDDHP) with associated hose and fittings will be stored at least 1200 feet away, in a perpendicular orientation to the typical hurricane path, from the first PDDP (or a distance</p>

	<p>evaluated based on area historical tornado size). A second new RCS high pressure makeup pump with associated hose and fittings will be stored at least 1200 feet away from first PDDHP. This ensures a PDDP pump, and a PDDHP pump will remain available during a tornado scenario. Missile protection will be accomplished based on the separation distance between the two pumps and redundancy (only one PDDP pump or PDDHP pump is used for the backup strategy). Storage will be on concrete pads away from any seismic II/I concerns at an elevation above the design basis flood and not susceptible to Local Intense Precipitation (LIP) concerns. The pumps will be tied down to the pad for wind protection and seismic movement. Basic environmental protection will be provided by an enclosure that will be rated for 110 mph sustained winds but will not be a seismic II/I hazard for the pumps (e.g. a wind rated fabric structure or seismic building).</p>
<p>3.1.1.2.A Confirm that at least one connection point for each use of a PDDP is protected from a seismic event (includes access to the connection point and areas the operators have to access to deploy or control the PDDP).</p>	<p>The tie in points for the PDDPs will be to seismically qualified piping and free of any II/I concerns that could prevent access needed to deploy or operate the pump.</p>
<p>3.1.1.2.B Confirm that a tow vehicle for FLEX equipment movement is reasonably protected from a seismic event, flooding event, and high wind event.</p>	<p>Multiple tow vehicles will be identified and stored and procedurally controlled above the flood level, away from adverse seismic interaction and secured against the 110 mph sustained design basis wind load.</p>
<p>3.1.1.3.A Procedural interface for seismic hazards -Confirm that operators have procedural guidance and references for the methods of obtaining local readings for critical parameters to support the implementation of the coping strategy, consistent with the guidelines in Section 3.2.1.10 of NEI 12-06.</p>	<p>FSGs are being developed to provide this guidance.</p>

<p>3.1.1.4.A Off-Site Resources – Confirm the location of the local staging area for the RRC equipment, and that access routes to the site, the method of transportation, and the drop off area have been properly evaluated for all applicable hazards.</p>	<p>The local staging area will be in the General Office Building parking area just off the South access road. This location is away from seismic interaction concerns and above the flood elevation.</p>
<p>3.1.5 High temperature – Confirm that the effects of high temperature have been considered in the procurement, protection, and deployment of FLEX equipment.</p>	<p>High temperature has been included in the design and storage of FLEX equipment. The SEPS generators and switchgear are located in environmental structures. At least one PDDP is located in a structure that protects against high temperature. Equipment designed to IEEE standards of 104 degrees F bound postulated high temperature conditions at the site.</p>
<p>3.2.1.7.A Confirm that portable FLEX equipment is included in the licensee’s program to maintain equipment available for deployment in shutdown and refueling modes.</p>	<p>Portable FLEX equipment (including the SEPS gensets) will be maintained in shutdown and refueling modes.</p>
<p>3.2.1.9.A Use of portable pumps – Confirm that appropriate procedural guidance is provided for operation of the PDDPs for SG and RCS injection as part of the FLEX strategies.</p>	<p>The PDDP is capable of injection into the SGs after manual depressurization using the atmospheric dump valves. The injection path is into the main feedwater header to existing 2” drain lines located between the Feedwater Isolation Valves (FWIVs) and the main feedwater check valves. The existing guidance in the Station’s Severe Accident Guidelines (SAG’s) to depressurize the SG’s and provide feedwater will be incorporated into the FSGs.</p> <p>The PDDP is capable of makeup to a depressurized SG. Per the vendor curve for the PDDP, the pump is capable of producing 225 psig TDH at a flow rate of 1000 gpm. Per the pump curves, both pumps can produce significantly greater than 1,000 gpm flow before they approach their runout limits.</p> <p>The 275 psig upper pressure limit used is a restriction based on the pressure rating of the temporary hoses and the capability of</p>

	<p>the PDDP's. The SAG will be modified for use as an FSG.</p> <p>Currently the Station's Severe Accident Guidelines (SAG's), provide procedural direction for use of the PDDP as an RCS makeup source, temporarily connecting either a high pressure suction source (defined as between 150 and 275 psig) or a low pressure suction source (defined as <150 psig) to the suction side of either a Charging or a Safety Injection pump.</p> <p>Seabrook is enhancing the FLEX strategy by including two Portable Diesel Driven High Pressure Makeup pumps (PDDHPs) that are capable of injection into the RCS. Procedural guidance to connect and inject into the charging pump discharge header at either the A charging pump or B charging pump 4" discharge piping located in the charging pump rooms¹ will be incorporated into the FSGs. The FSGs will use the new PDDHP, connecting the suction side of the pump to the Refueling Water Storage Tank (RWST) at an existing blank flanged connection in the PAB. The procedure will include steps to use the Reactor Makeup Water (RMW) tank, Boric Acid tanks, or Fire Water Main as alternate suction sources. The SAGs will be modified to use the new PDDHP as well.</p>
<p>3.2.1.9.B Confirm availability of the fire main to provide a suction source for the PDDP for all of the hazards applicable to Seabrook.</p>	<p>The PDDP suction can be aligned to the fire main piping. The fire main will remain available for all hazards except for a seismic event. The source of water for the fire main at the fire pumps and tanks is not Seismic Class I and not protected from all hazards. Water inventory from this source that is protected from all hazards is therefore limited to the seismically qualified portions of the fire protection system. In the event of a seismic event, the FSGs will isolate this section of seismic fire main piping from the non-seismic portions</p>

¹ Preliminary, final location provided per EOC contract

	<p>to preserve the integrity of the seismic FP header.</p> <p>There is also a 6” cross-connect line (via FP-V761 and FP-V970) from the Service Water header to the FP header that can be used to supply additional water to FP in the event that the FP tanks and non-seismic FP piping is lost.</p> <p>In addition to the Fire Protection system, the Refueling Water Storage Tank is located within a Seismic Class I building and protected from all hazards. A suction path for the PDDP s and RCS makeup pumps will be developed as part of the Flex procedures to utilize this borated water source. Additional water sources include the Reactor Makeup Water Storage (RMW) Tank & Boric Acid Tanks, the Demin Water Storage Tanks and the Condensate Storage Tank. The FSGs for operation of the PDDP s and the RCS makeup pump will list the available connections and will prioritize the selection of available suction sources.</p>
<p>3.2.2.A Confirm that the PDDPs and hose trailers are incorporated into the FLEX guidelines for makeup and spray to the SFP.</p>	<p>The FLEX guidelines will not utilize the PDDPs for this purpose. The SFP is located below grade. The strategy for SFP makeup will use gravity drain from the RWST which is located inside a Class I structure protected from all hazards.</p>
<p>3.2.4.4.A Confirm that adequate portable lighting is available for operator use during an ELAP event.</p>	<p>Portable lighting will not be needed if either SEPS genset is available. Portable battery powered lighting will be available for use during the ELAP event in the event both SEPS are inoperable.</p>
<p>3.2.4.4.B The NRC staff has reviewed the licensee communications assessment (ADAMS Accession Nos. ML 12311A34 and ML 13060A048) and has determined that the assessment and planned upgrades are reasonable (ADAMS Accession No. ML 13102A254). Confirm that the upgrades have been completed.</p>	<p>Upgrades have been completed.</p>

<p>3.2.4.7.A Confirm the source of water to be used for makeup to the service water cooling basin tower by the portable diesel-driven cooling tower makeup pump.</p>	<p>The nearby brackish Brown's River is the source of water.</p>
<p>3.2.4.8.B Confirm that any SEPS missile barrier modifications do not interfere with the ability to remove snow from the SEPS DGs air intake system.</p>	<p>The barrier will be designed to facilitate snow removal from the intake system area.</p>
<p>3.2.4.9.A Confirm that the refueling strategy for SEPS has been changed to require refueling to begin within 24 hours of the event.</p>	<p>The SEPS refueling plan in the original OIP uses a small tank (500 gallons) mounted on a trailer to transfer diesel fuel from the EDG storage tanks to the SEPS within 36 hours. However, in the event that only one SEPS is available post ELAP, refueling will be required after 24 hours. Accordingly the refueling requirement for SEPS has been revised to 24 hours. The trailer and associated hoses will be stored in the Class I SW pump house. The refueling strategy will provide the 178 gal per hour needed to refuel the SEPS engines within the required 24 hours.</p>
<p>3.3.1.A Confirm that the PDDPs will be included in the maintenance and testing (M&T) program in conformance with the Electric Power Research Institute report on M&T.</p>	<p>The PDDPs will be incorporated into the maintenance and testing program consistent with EPRI guidance.</p>
<p>3.3.2.A Confirm that the configuration control of FLEX strategies conforms to the guidance of Section 11.8 of NEI 12-06.</p>	<p>Configuration control for the FSGs will conform to the guidance of Section 11.8 of NEI 12-06.</p>
<p>3.4.A Offsite resources - Confirm that NEI 12-06, Section 12.2 guidelines 2 through 10, regarding minimum capabilities for offsite resources, have been adequately addressed.</p>	<p>The staffing analysis will confirm that NEI-12-06, Section 12.2 guidelines 2 through 10, regarding minimum capabilities for offsite resources, have been adequately addressed.</p>

8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. NextEra Energy Seabrook LLC - SBK-L-13038 - Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2013.
 2. NRC Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012.
 3. NextEra Energy Seabrook, LLC First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, (Order Number EA-12-049), dated August 28, 2013
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