NEXTera® ENERGY
SEABROOK

February 27, 2015
SBK-L-15026
Docket No. 50-443

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

Seabrook Station

NextEra Energy Seabrook, LLC's Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

References:

1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012 (ML12056A044)
2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012 (ML12221A339)
3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 1, dated August 2012
4. NextEra Energy Seabrook, LLC Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, (Order Number EA-12-051), dated October 26, 2012 (ML12311A012)
5. NextEra Energy Seabrook, LLC Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, (Order Number EA-12-051), dated February 26, 2013 (ML13063A439)
6. NextEra Energy Seabrook, LLC, First Six Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation , dated August 28, 2013 9ADAMS Accession No. ML13247A177).
7. Seabrook Station, Unit 1 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0837), Dated December 4, 2013 (ADAMS Accession No. ML13267A388).

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8. NextEra Energy Seabrook, LLC, Second Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated February 27, 2014 (ADAMS Accession No. ML14064A189).
9. NextEra Energy Seabrook, LLC, Third Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated August 24, 2014 (ADAMS Accession No. ML14246A192).

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 install reliable spent fuel pool level instrumentation. 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 12-02, Revision 1 (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 6 provided NextEra Energy Seabrook's first six-month status report. In Reference 7, the NRC requested additional information to enable the continued technical review of the NextEra Energy Seabrook Overall Integrated Plan (OIP). Reference 8 provided an update of milestone accomplishments since the last status report, including changes to the compliance method, schedule, or need for relief and the basis, if any. It also provided responses to the Reference 7 request for additional information to the extent possible. Reference 9 provided the third update of milestone accomplishments and also included answers to the request for additional information.

The attachment to this letter provides the fourth six-month status update of milestone accomplishments since the last status report, including 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 February 27 , 2015.

Sincerely,

NextEra Energy Seabrook, LLC

Dean Curtland
Site Vice President

Attachment

cc: D. Dorman, NRC Region I Administrator
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Attachment to SBK-L-15026

NextEra Energy Seabrook, LLC's Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

ATTACHMENT

1.0 INTRODUCTION

By letter dated February 26, 2013 (Agency wide Documents Access and Management System (ADAMS) Accession No. ML13063A439), NextEra Energy Seabrook, LLC (NextEra, the licensee) submitted an Overall Integrated Plan (OIP) for the Seabrook Nuclear Plant in response to the March 12, 2012, U.S. Nuclear Regulatory Commission (NRC) Order modifying licenses with regard to requirements for Reliable Spent Fuel Pool (SFP) Instrumentation (Order Number EA-12-051, ADAMS Accession No. ML12056A044). This submittal 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 and the basis.

2.0 MILESTONE ACCOMPLISHMENTS

- Commence Engineering and Design – This milestone is in progress. Seabrook has selected SFP level instrumentation that will be used to meet the criteria delineated in the Overall Integrated Plan. Engineering Change 281849 for installation of the selected SFP level instrumentation is in the approval stage of development.
- Submit First 6 month update – Complete
- Submit Second 6 month update – Complete
- Submit Third 6 month update – Complete

3.0 MILESTONE SCHEDULE STATUS

There currently are no changes to the Milestone Schedule provided in the Overall Integrated Plan (Reference 1). Any changes to the following target dates will be reflected in the six month updates.

The current milestones are:

• Complete Engineering and Design	1Q 2015 (March)
• Complete Procurement of SFP Instruments	1Q 2015 (March)
• Complete Installation/ Instruments Operational	3Q 2015 (August)
• Submit Fifth 6 Month Update	3Q 2015 (August)
• Second Refueling Outage	3Q 2015 (October)
• Training Complete	3Q 2015 (October)
• Required implementation date:	3Q 2015 (Refueling Outage 17)

4.0 CHANGES TO COMPLIANCE METHOD

There currently are no changes to the compliance method documented in the Overall Integrated Plan (Reference 1). Consistent with the requirements of Order EA-12-051 (Reference 2) and the Order guidance documents, the six month reports will delineate any proposed changes to compliance methods.

5.0 NEED FOR RELIEF/ RELAXATION AND BASIS

Seabrook is not requesting relief from the requirements of Order EA-12-051 (Reference 2) or guidance document JLD-ISG-2012-03 (Reference 3) at this time.

Consistent with the requirements of Order EA-12-051 (Reference 2) and the guidance in NEI 12-02 (Reference 4), the six month reports will delineate progress made, any proposed changes in compliance methods, updates to the schedule, and if needed, requests for relief and their bases.

6.0 REQUESTS FOR ADDITIONAL INFORMATION

The NRC staff determined that additional information was required to enable the continued technical review of the NextEra Energy Seabrook, LLC (NextEra) Overall Integrated Plan (OIP). Table 1 provides a summary of the status of responses to the Request for Additional Information (RAIs) that were received on December 4, 2013 (Reference 5). Enclosure 1 provides details of the SFP mounting bracket for the level measuring instruments. Enclosure 2 summarizes the design requirements for the Westinghouse supplied level monitoring equipment with reference applicable Westinghouse qualification documentation. Required changes to RAI responses that result from changes in details developed during installation will be provided to the NRC as part of a future six month update.

Table 1

Open RAIs	Status
RAI-1 - Levels	Complete, Reference 11
RAI-2 - Arrangement	Complete, Reference 11
RAI-3 a, b, c – Mounting	Complete, Table 2
RAI-4 – Mounting	Complete, Table 2
RAI-5 - Mounting	Complete, Reference 11
RAI-6 a, b, c – Qualification	Complete, Table 2
RAI-7 – Qualification	Complete, Table 2
RAI-8 – Independence	Complete, Table 2
RAI-9 – Power Supply	Complete, Table 2
RAI-10 – Accuracy	Complete, Table 2
RAI-11 – Testing and Calibration	Complete, Table 2
RAI-12 – Display	Complete, Table 2
RAI-13	Complete, Reference 11
RAI-14	Complete, Reference 11
RAI-15 – Testing and Calibration	Complete, Table 2

References

1. NextEra Energy Seabrook, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2013 (ADAMS Accession No. ML13063A439)

2. NRC Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ADAMS Accession No ML12056A044).

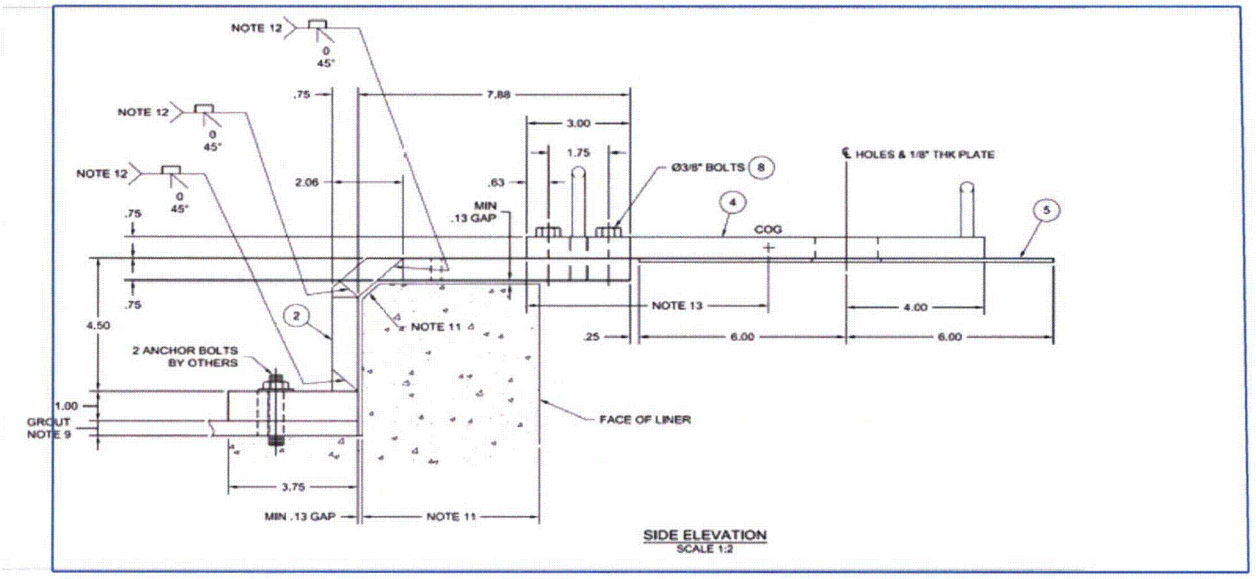
3. NRC JLD-ISG-2012-03, Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation, Revision 0, August 29, 2012.

4. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1, August 2012.

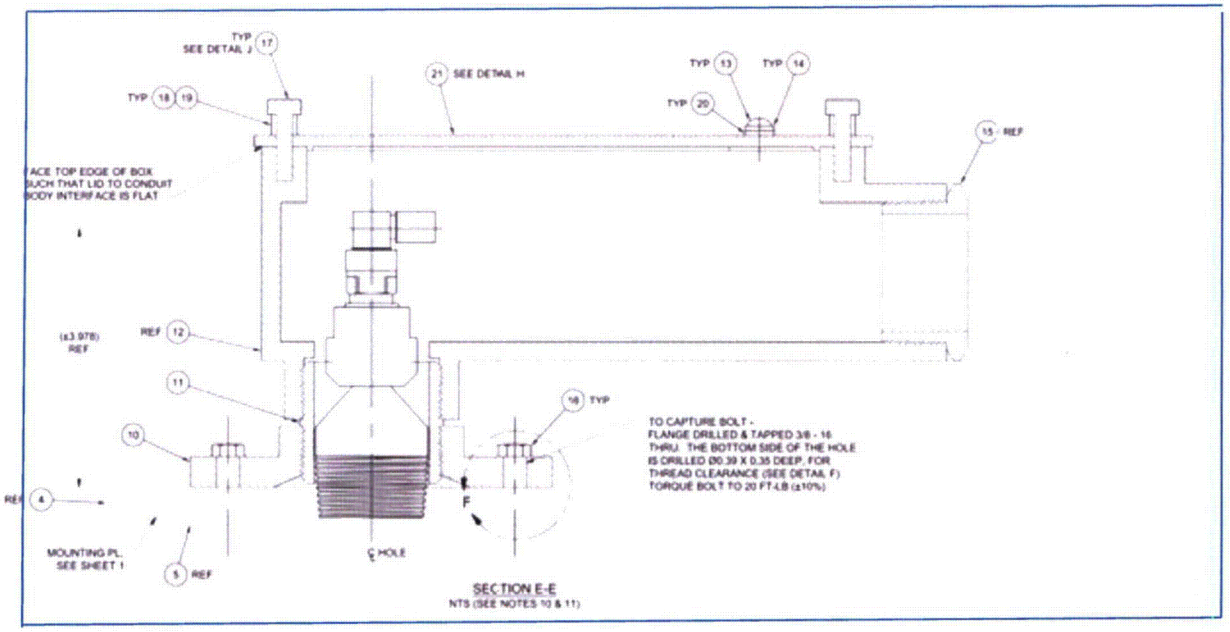
5. Seabrook Station, Unit 1 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0837), Dated December 4, 2013 (ADAMS Accession No. ML13267A388).

Enclosure - 1

Seabrook SFPIS Mounting Bracket



SIDE ELEVATION VIEW



COUPLER ASSEMBLY

Enclosure 2 to SBK-L-15026

Design Requirements for the Westinghouse Supplied Level Monitoring Equipment

ENCLOSURE - 2						
#	**Topic**	**Parameter Summary**	**Westinghouse Reference Document Number**	**Additional Comment**	**Test or Analysis Results**	**Licensee Evaluation**
1	Design Specification	SFPIS Requirements derived from References 1, 2, & 3	WNA-DS-02957-GEN	Contains technical SFPIS requirements based on NRC order, NEI guidance.	N/A	The design and implementation requirements as defined in Table 2 references 1, 2 and 3 are bounded by the design Westinghouse Design Specification for the SFPIS (WNA-DS-02957-GEN).
2	Test Strategy	Per Requirements.	WNA-PT-00188-GEN	Strategy for performing the testing and verification of the SFPIS and pool-side bracket.	N/A	The SFPIS qualification test strategy as described in WNA-PT-00188-GEN envelopes the Seabrook specific environmental and seismic design requirements. Refer to Seabrook Specification S-S-E-0227, Spent Fuel Pool Instrumentation System.
3	Environmental qualification for electronics enclosure with Display	50^0 F to 140^0 F, 0 to 95% RH TID $\leq$ 1E03 R γ normal (outside SFP area) TID $\leq$ 1E03 R γ abnormal (outside SFP area)	EQ-QR-269 and WNA-TR-03149-GEN for all conditions.	Results are summarized in EQ-QR-269 and WNA-TR-03149-GEN. Radiation Aging verification summarized in Section 5 of WNA-TR-03149-GEN. .	Test passed conditions described.	For Seabrook specific temperature and humidity requirements the electronic enclosures that will be located in the Containment Enclosure Building and Control Building Essential Switchgear Rooms are enveloped by the Westinghouse qualification for normal and BDBE conditions. As described in Westinghouse Report WNA-TR-03149-GEN, radiation is not considered to be an aging mechanism for equipment that is only subjected to TID $\leq$ 1E4 rads. TID to equipment located in the Containment Enclosure Building and Control Building Essential Switchgear Rooms will be less than 1E3 rads for normal and BDBE conditions. Refer to Seabrook Specification S-S-E-0227, Spent Fuel Pool Instrumentation System. Westinghouse has provided an interim position regarding the radiation aging qualification and the open item from Steris (ref. Response to Table 2, NRC Question 7). NextEra Energy is tracking closure of the open item and will provide additional update if Westinghouse's position changes.

ENCLOSURE - 2						
#	**Topic**	**Parameter Summary**	**Westinghouse Reference Document Number**	**Additional Comment**	**Test or Analysis Results**	**Licensee Evaluation**
4	Environmental Testing for Level Sensor components in SFP area – Saturated Steam & Radiation	50 ^{0} F to 212^{0} F and 100% humidity	EQ-QR-269	Thermal aging test results summarized in EQ-QR-269 Section 5.2. Steam test results summarized in EQ-QR-269 Section 5.7.	Passed	The temperature and humidity values of 212°F and 100% envelop the service environment requirements for the SFPIS components that will be located in the SFP area. Refer to Seabrook Specification S-S-E-0227, Spent Fuel Pool Instrumentation System.
		1E03 R γ normal (SFP area)	WNA-TR-03149-GEN and EQ-QR-269	Thermal Aging & radiation aging verification are summarized in Sections 4.1 and 5 (entire system) of WNA-TR-03149-GEN	Passed	The normal operating dose in the SFP area per is ≤ 1.E03 R γ. Refer to Seabrook Specification S-S-E-0227, Spent Fuel Pool Instrumentation System.
		1E07 R γ BDBE (SFP area)	EQ-QR-269	Radiation aging program was conducted in accordance with procedures EQ-TP-326 and EQ-TP-354. Radiation aging results are summarized in EQ-QR-269 Section 5.3.	Passed	The BDBE radiation value to which the Westinghouse equipment was qualified is 1.E+9 R γ for the probe stainless steel cable and weight and 1E+7R γ for the equipment on the Operating deck above the pool (Ref. Section 5.1.2 of WNA-TR-03149-GEN). With SFP water level at Level 3 the only components of SFPI that are exposed to the SFP are the stainless steel probe and the stainless steel anchor. Since stainless steel is inherently resistant to degradation from radiation the probe and anchor, environmental testing of these components was not required. Equipment located above the SFP (Coaxial cable, coupler and connector) were aged to 1E+11 R γ to assure qualification to 1E+7 R γ. Westinghouse completed its aging qualification of the SFPIS to 10 years. Westinghouse has provided an interim position regarding the radiation aging qualification and the open item from Steris (ref. Response to Table 2, NRC Question 7). NextEra Energy is tracking closure of the open item and will provide additional update if Westinghouse's position changes.

ENCLOSURE - 2						
#	**Topic**	**Parameter Summary**	**Westinghouse Reference Document Number**	**Additional Comment**	**Test or Analysis Results**	**Licensee Evaluation**
5	Environmental Testing for Level Sensor Electronics Housing – outside SFP	50^0 F to 140^0 F, 0 to 95% RH TID ≤ 1E03 R γ normal (outside SFP area) TID ≤ 1E03 R γ abnormal (outside SFP area)	WNA-TR-03149-GEN and EQ-QR-269	Testing summarized in WNA-TR-03149-GEN, Section 3.3. Radiation Aging verification summarized in WNA-TR-03149-GEN, Section 5. Thermal aging test results summarized in EQ-QR-269 Section 5.2. Steam test results summarized in EQ-QR-269 Section 5.7	Passed	Temperature is ≤ 140°F and humidity is ≤ 95% RH for abnormal conditions in the Containment Enclosure Building and Control Building Essential Switchgear Rooms. As described in Westinghouse Report WNA-TR-03149-GEN, radiation is not considered to be an aging mechanism for equipment that is only subjected to TID ≤ 1E4 rads. TID to equipment located in the Containment Enclosure Building and Control Building Essential Switchgear Rooms will be less than 1E3 rads for normal and BDBE conditions. Refer to Seabrook Specification S-S-E-0227, Spent Fuel Pool Instrumentation System
6	Thermal & Radiation Aging – organic components in SFP area	1E03 R γ normal (SFP area) 1E07 R γ BDBE (SFP area)	EQ-QR-269 and WNA-TR-03149-GEN	Thermal aging test results summarized in EQ-QR-269 Section 5.2. Radiation aging results are summarized in EQ-QR-269 Section 5.3 Thermal Aging & radiation aging verification summarized in Sections 4.1 and 5 of WNA-TR-03149-GEN.	Passed	See response to Item 4 above. Aging Tests – Westinghouse completed aging qualification of SFPIS to 10 years. Westinghouse has provided an interim position regarding the radiation aging qualification and the open item from Steris (ref. Response to Table 2, NRC Question 7). NextEra Energy is tracking closure of the open item and will provide additional update if Westinghouse's position changes.

ENCLOSURE - 2						
#	**Topic**	**Parameter Summary**	**Westinghouse Reference Document Number**	**Additional Comment**	**Test or Analysis Results**	**Licensee Evaluation**
7	Basis for Dose Requirement	**Normal Conditions**: 1E03 R γ TID (above pool) 1E09 R γ TID (1' above fuel rack) **BDBE Conditions:** 1E07 R γ TID (above pool) ≤1E09 R γ TID (1' above fuel rack)	LTR-SFPIS-13-35 and WNA-DS-02957-GEN	Westinghouse Basis for Radiation Dose Requirement	Passed for all conditions	NextEra has determined the Westinghouse basis is acceptable. The normal operating dose in the SFP area is ≤1E+3 R γ, which is bounding for Seabrook. Refer to Section 5.1.1 of WNA-TR-03149-GEN and Seabrook specification S-S-1-E--0227, Spent Fuel Pool Instrumentation System. Equipment located above the SFP (Coaxial cable, coupler and connector) were aged to 1E+11 R γ to assure qualification to 1E+7 R γ. The as tested test BDBE condition (TID of 1E+11 R γ) above bounds the Seabrook requirement of 1.06E+7 R γ.
8	Seismic Qualification	Per Spectra in WNA-DS-02957-GEN	EQ-QR-269	EQ-QR-269 summarizes the results of seismic testing that was performed by Westinghouse.	Passed	The TRS that was used by Westinghouse for seismic qualification of the SFPIS, including the poolside mounting brackets, envelops the Seabrook RSS.
			WNA-TR-03149-GEN	WNA-TR-03149-GEN provides high level summary of the pool-side bracket analysis and equipment seismic test program.	Passed	

ENCLOSURE - 2						
#	**Topic**	**Parameter Summary**	**Westinghouse Reference Document Number**	**Additional Comment**	**Test or Analysis Results**	**Licensee Evaluation**
			EQ-TP-353 (procedure)	Seismic Pull test for straight and 90 degree coaxial connectors was performed in accordance with Westinghouse procedure EQ-TP-353.	Passed	
9	Sloshing	N/A	LTR-SEE-II-13-47 and WNA-TR-03149-GEN.	Calculation to demonstrate that probe will not be sloshed out of the SFP. Sloshing is also addressed in Section 7.2 of WNA-TR-03149-GEN.	Passed	Adequate sloshing forces (inclusive of vertical and horizontal impact forces, hydrodynamic forces) were considered by Westinghouse in the calculation for sloshing forces. The calculated forces were also considered by Westinghouse in the design the bracket, including anchorage requirements, to ensure the probe will not be degraded or sloshed out of the SFP during a seismic event.
10	Spent Fuel Pool Instrumenta-tion System Functionality Test Procedure	Acceptance Criteria for Performance during EQ testing	WNA-TP-04613-GEN and WNA-TP-00189-GEN	Test plan and procedure used to demonstrate that SFPIS meet its operational and accuracy requirements during Equipment Qualification Testing.	Passed	The monitoring requirements from Westinghouse procedures WNA-TP-04613-GEN and WNA-TP-00189-GEN assure SFPIS performance in accordance with requirements of Table 2 reference 1, 2 and 3.
11	Boron Build-Up	Per requirement in WNA-DS-02957-GEN	WN-TR-03149-GEN, LTR-CDME-13-78A and LTR-SFPIS-13-026	Boron build up demonstrated through Integrated Functional Test (IFT).	Passed	Boron buildup testing and justification provided in WNA-TP-00189-GEN "Integrated Functional Test Plan" assure SFPIS performance in accordance with the requirements of Table 2 reference 1, 2 and 3

ENCLOSURE - 2						
#	Topic	Parameter Summary	Westinghouse Reference Document Number	Additional Comment	Test or Analysis Results	Licensee Evaluation
12	Pool-side Bracket Seismic Analysis	N/A	CN-PEUS-14-16	Analysis included seismic forces and hydrodynamic forces, as appropriate.	Passed	See response to NRC Question. 4. Seabrook seismic requirements to withstand a SSE are bounded by the Westinghouse analysis for the poolside mounting bracket. Equipment anchorage will be designed by Seabrook to meet the calculated Westinghouse loads (tension and shear loads, and hydrodynamic load) with appropriated safety margin.
13	Additional Brackets (Sensor Electronics and Electronics Enclosure)	N/A	WNA-DS-02957-GEN	Weights provided to licensees for their own evaluation.	N/A	Equipment anchorage will be designed by Seabrook to meet the calculated Westinghouse loads (tension and shear loads, and hydrodynamic load) with appropriated safety margin.
14	Shock & Vibration	WNA-DS-02957-GEN	WNA-TR-03149-GEN	WNA-TR-03149-GEN, Section 7 provides justification for shock and vibration.	N/A	Westinghouse SFP measurement channels will be permanently installed and fixed to rigid, structural walls or floors of Seismic Category 1 structures.

ENCLOSURE - 2						
#	**Topic**	**Parameter Summary**	**Westinghouse Reference Document Number**	**Additional Comment**	**Test or Analysis Results**	**Licensee Evaluation**
15	Westinghouse Factory Acceptance Test, including dead zone verification.	Integrated Functional Test Requirements from WNA-DS-02957-GEN. 12" dead-zone at top of probe 4" dead-zone at bottom of probe	WNA-TP-04752-GEN, WNA-TR-03357-WEP, WNA-TR-03351-GPRY1	The Integrated Functional Test demonstrated functionality of the full system, which included calibration of each channel. Dead-zone tests are described in WNA-TP-04752-GEN, Section 9.6.2.	passed	SFPIS functional testing and post modification testing in accordance with Engineering Change 281849 assure SFPIS performance in accordance with the requirements of Table 2 references 1, 2 and 3.
16	Channel Accuracy	+/- 3 inches per WNA-DS-02957-GEN	WNA-CN-00301-GEN	Channel accuracy from measurement to display.	Passed	Seabrook has reviewed WNA-DS-02957-GEN and WNA-CN-00301-GEN and found that channel accuracy requirements are met.
17	Power Consumption	3 day battery life (minimum) SFPIS power consumption	WNA-CN-00300-GEN	N/A	Passed	Seabrook has reviewed WNA-CN-00300-GEN and concluded that the SFPIS battery has a capacity that is > 72 hours which meets the Order requirements. The SFPIS power loading does not challenge the plant electrical distribution system or Emergency Diesel Generator loading.
18	Technical Manual	N/A	WNA-GO-00127-GEN	Information and instructions for Operation, Installation, use, etc. are included here.	N/A	Seabrook will utilize WNA-GO-00127-GEN as input for procedure preparation and system maintenance.

ENCLOSURE - 2						
#	**Topic**	**Parameter Summary**	**Westinghouse Reference Document Number**	**Additional Comment**	**Test or Analysis Results**	**Licensee Evaluation**
19	Calibration	Routine Testing/calibration verification and Calibration method	WNA-TP-04709-GEN	Includes preventative maintenance actions such as those for Boron buildup and cable probe inspection.	N/A	Seabrook will utilize WNA-TP-04709-GEN as input for development of plant procedures for calibration and preventive maintenance of the SFPIS.
20	Failure Modes and Effects Analysis (FMEA)	N/A	WNA-AR-00377-GEN	Addresses mitigations for the potential failure modes of the system.	N/A	Seabrook will utilize WNA-AR-00377-GEN as input for procedure preparation and system troubleshooting if required.
21	EMI/ RFI Qualification Testing	RG 1.180, Rev. 1 test conditions	WNA-TR-03149-GEN and EQ-QR-269	N/A	Passed to perfor-mance criterion B	Refer to the response to Table 2, NRC Question 7. NextEra has reviewed the test report and concluded that the results comply with the requirements performance criterion B.