



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

October 4, 2015

Mr. Dean Curtland
Vice President, Seabrook Nuclear Plant
c/o Michael Ossing
NextEra Energy Seabrook, LLC
P.O. Box 300
Seabrook, NH 03874

SUBJECT: SEABROOK STATION, UNIT 1 - RELAXATION OF THE SCHEDULE REQUIREMENTS OF ORDER EA-12-049, "ISSUANCE OF ORDER TO MODIFY LICENSES WITH REGARD TO REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS" (TAC NO. MF0836)

Dear Mr. Curtland:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A735), the U.S. Nuclear Regulatory Commission (NRC) ordered NextEra Energy Seabrook, LLC (NextEra, the licensee), to take certain actions at Seabrook Station, Unit 1 (Seabrook), associated with the Fukushima Near-Term Task Force Recommendations. Order EA-12-049 directed that actions be taken by licensees to develop and implement strategies to maintain or restore core cooling, containment, and spent fuel pool (SFP) cooling capabilities during beyond-design-basis external events.

Section IV of the order states, "As applicable, the Director, Office of Nuclear Reactor Regulation or the Director, Office of New Reactors may, in writing, relax or rescind any of the above conditions upon demonstration by the Licensee or [construction permit] holder of good cause." By letter dated July 23, 2015 (ADAMS Accession No. ML15209A581), NextEra submitted a request for relaxation of the schedule requirement for full implementation for Seabrook as prescribed in Section IV A.2 of NRC Order EA-12-049. That requirement states, in part, "All holders of operating licenses issued under Part 50 . . . shall complete full implementation no later than two (2) refueling cycles after submittal of the overall integrated plan [OIP], as required in Condition C.1.a, or December 31, 2016, whichever comes first."

You stated in your request that November 2015 is the planned end of the second refueling outage after transmittal of the original OIP. Therefore, consistent with the schedule requirements of Order EA-12-049, full implementation of the mitigating strategies for Seabrook must be completed prior to startup from the November 2015 refueling outage. You requested that the required date for full implementation for Seabrook be relaxed until May 30, 2016.

In your July 23, 2015, letter, you provided several reasons in support of your relaxation request for Seabrook. You indicated that Seabrook's original strategy employed the supplemental electrical power system (SEPS), which is a permanently installed set of two diesel generators and supporting equipment, and the service water cooling tower. During a beyond-design-basis external event, SEPS would provide alternating current power to an emergency bus and the cooling tower would provide cooling to critical loads. However, you indicated that SEPS and the cooling tower are not fully protected from high wind events, including wind driven missiles; therefore, a second set of strategies was developed to ensure that all external events can be addressed. These strategies add a complete set of fully protected portable equipment, independent of SEPS. By letter dated February 27, 2015 (ADAMS Accession No. ML15068A021), you communicated the new strategies to the NRC in Seabrook's fourth six-month status report. Due to the new strategies, schedule relaxation is needed to 1) complete the modifications to the service water pumphouse to allow its use as the fully protected storage location of the portable equipment and 2) complete validation and verification of the new strategies with respect to equipment stored in the service water pumphouse.

Also, your letter indicated that there is minimal impact to safety during the 7-month implementation delay. Specifically, Seabrook has already developed procedures and has trained personnel on how to operate the SEPS and realign plant cooling to the service water cooling tower, which can mitigate the majority of external events. Regarding potential high wind events (i.e., missile protection) during the delay, portable equipment onsite will be stored more than 1200 feet from the SEPS equipment to provide protection by separation. Lastly, the service water pumphouse modification and final implementation will occur prior to the next hurricane season.

In light of the facts presented, the NRC staff has determined that the licensee has presented good cause for a relaxation of the order implementation date. Due to the new strategies, the modification of the service water pumphouse, which is designed to protect against all hazards, is necessary at Seabrook to meet the requirement of the order to protect equipment that is needed to implement mitigating strategies. In addition, the NRC staff agrees that the timeframe from the February 27, 2015, notification of the new strategies to the November 2015 implementation date is extremely short given the work required to be completed, including finalizing modifications, testing new portable equipment, generating new procedures, and completing training. The NRC staff also considered that, following the accident at Fukushima Dai-ichi, the NRC concluded that a sequence of events such as the Fukushima Dai-ichi accident is unlikely to occur in the United States, based on the current regulatory requirements and existing plant capabilities. Therefore, the extension of time (approximately 7 months) for Seabrook to achieve full implementation of the requirements of the mitigation strategies order until May 30, 2106, is justified. Given the plant-specific circumstances at Seabrook, and that the proposed completion date is prior to the ultimate implementation date of the order, the NRC staff approves the relaxation request.

D. Curtland

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Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the requirement of the order for full order implementation for Seabrook is relaxed until May 30, 2016.

If you have any questions, please contact Jason Paige, at 301-415-5888.

Sincerely,

A handwritten signature in black ink, appearing to read 'W M Dean', with a long horizontal flourish extending to the right.

William M. Dean, Director
Office of Nuclear Reactor Regulation

Docket No. 50-443

cc: Listserv

D. Curtland

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Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the requirement of the order for full order implementation for Seabrook is relaxed until May 30, 2016.

If you have any questions, please contact Jason Paige, at 301-415-5888.

Sincerely,

/RA/

William M. Dean, Director
Office of Nuclear Reactor Regulation

Docket No. 50-443

cc: Listserv

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***via email**

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