NEXTera ENERGY POINT BEACH

February 4, 2011

NRC 2011-0010
GL 2004-02

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

Point Beach Nuclear Plant, Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

Plan for Completion of Actions for Generic Letter 2004-02
Potential Impact for Debris Blockage in Emergency Recirculation During
Design Basis Accidents at Pressurized-Water Reactors
(TAC No. MC4705/MC4706)

References: See Below

Via Reference (1), the Commission granted a request submitted and subsequently supplemented by NextEra Energy Point Beach, LLC (NextEra) (References 2 and 3) for an extension to achieve compliance with the provisions of Generic Letter (GL) 2004-02 for Point Beach Nuclear Plant (PBNP), Unit 1.

The Regulatory Commitment made by NextEra in Reference (3), and reiterated in Reference (1), states the following:

- Within 60 days following establishment of sufficient Commission direction to resolve the remaining GSI-191 issues, PBNP will submit to the NRC a plan with milestones to achieve final resolution.

The extension was approved until 90 days following Commission direction to the NRC staff to address the NRC Staff Requirements Memorandum dated May 17, 2010. The Commission provided the stated direction to the NRC staff via Reference (4).

With respect to PBNP Unit 2, the extension was approved by the NRC in a letter dated June 30, 2009 (Reference 5). Unit 2, therefore, was not addressed in References (1) and (3). The Regulatory Commitment made in Reference (6) states that NextEra will complete modifications to resolve GSI-191 for Unit 2 by June 30, 2011.

Subsequent to the above correspondence, Reference (4) was issued by the Commission to the NRC staff on December 23, 2010. This document acknowledges that stakeholders and the Staff have agreed upon tests and analyses that remain to be completed regarding in-vessel effects, which could be the controlling factor in resolving GSI-191. It further acknowledges the prudence of deferring further plant modification actions, such removal of fibrous insulation, until tests and analyses are complete.

A path forward is uncertain, pending completion of testing and analyses, and completion of NRC staff evaluations of Options 1 and 2, which are expected to occur over the next 18-month period and will culminate with a report to the Commission. Accordingly, it would be premature for NextEra to provide a detailed milestone schedule and activities for resolution and closure of GL 2004-02 at this time, pending further direction from the NRC staff.

The deterministic justification for continued operation provided to the Commission by NextEra for the previously requested extensions for resolution and closure of GL 2004-02 remain unchanged. In Reference (4), the Commission further validates NRC staff and licensee conclusions to date by stating, "...the vastly enlarged advanced strainers installed, compensatory measures already taken, and the low probability of challenging pipe breaks, adequate defense-in-depth is currently being maintained."

NextEra has established and implemented mitigating measures and physical improvements such as a new strainer design installed on both Units 1 and 2 which significantly increases the available flow area from approximately 21 ft^2 to 1,900 ft^2. The amount of fibrous insulation inside containment on both Units has been significantly reduced. In addition to the physical modifications that have taken place at PBNP, inspections of the protective coatings in containment are performed on a refueling outage frequency, in accordance with the PBNP protective coatings program. Procedural controls have been established to limit potential debris sources in containment and emergency procedures have been revised to direct operators to monitor sump performance.

Therefore, the above Regulatory Commitments for Units 1 and 2 are revised as follows:

- NextEra shall develop a plan to achieve final resolution of GSI-191 for PBNP, Units 1 and 2, consistent with future industry guidance and the Reference (4) Staff Requirements Memo, by June 30, 2012.

If you have questions or require additional information, please contact Mr. James Costedio at 920/755-7427.

In accordance with the provisions of 10 CFR 50.91, a copy of this submittal has been provided to the designated Wisconsin Official.

Very truly yours,

NextEra Energy Point Beach, LLC

Larry Meyer
Site Vice President

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
PSCW

References:
(1) NRC letter to NextEra Energy Point Beach, LLC, dated June 30, 2010, Point Beach Nuclear Plant, Unit 1 - Generic Letter 2004-02 Extension Request Approval (TAC No. MC4705) (ML101800052)
(2) NextEra Energy Point Beach, LLC letter to NRC, dated February 19, 2010, Request for Extension of Completion Date for Generic Letter 2004-02, Potential Impact for Debris Blockage in Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors (TAC No. MC4705/MC4706) (ML100500632)
(3) NextEra Energy Point Beach, LLC letter to NRC, dated June 11, 2010, Supplemental Response for Extension Request for Completion of Actions for Generic Letter 2004-02, Potential Impact for Debris Blockage in Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors (TAC No. MC4705/MC4706) (ML101650080)
(4) U.S. Nuclear Regulatory Commission, "Staff Requirements - SECY-10-0113 - Closure Options for Generic Safety Issue - 191, Assessment of Debris Accumulation on Pressurized Water Reactor Sump Performance," Commission Staff Requirements Memo SECY-10-0113, December 23, 2010 (ML103570354)
(5) NRC letter to NextEra Energy Point Beach, LLC, dated June 30, 2009, Point Beach Nuclear Plant, Units 1 and 2 - GSI-191/GL 2004-02 Additional Extension Request Approval (TAC Nos. MC4705 and MC4706) (ML091800430)
(6) NextEra Energy Point Beach, LLC letter to NRC, dated June 12, 2009, Request for Extension of Unit 1 and 2 Completion Dates for Generic Letter 2004-02, Potential Impact for Debris Blockage in Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors (TAC Nos. MC4705/MC4706) (ML091660326)