

January 25, 2001

Mr. Mark Reddemann  
Site Vice President  
Kewaunee and Point Beach Nuclear Plants  
Nuclear Management Company, LLC  
6610 Nuclear Road  
Two Rivers, WI 54241

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 - REQUEST FOR  
ADDITIONAL INFORMATION RE: SECTION 5.0 OF IMPROVED TECHNICAL  
SPECIFICATIONS CONVERSION (TAC NOS. MA7186 AND MA7187)

Dear Mr. Reddemann:

By letter dated November 15, 1999, the licensee submitted a license amendment request to convert the current Technical Specifications to improved Technical Specifications for Point Beach, Units 1 and 2.

The enclosed request for additional information was discussed with Mr. Jack Gadzala during a conference call on October 12, 2000. A mutually agreeable target date of 30 days from the date of this letter for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-1355.

Sincerely,

*/RA/*

Beth A. Wetzel, Senior Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosures: Request for additional information

cc w/encls: See next page

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Point Beach Nuclear Plant, Units 1 and 2

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Point Beach Nuclear Plant Units 1 and 2 Improved TS Review Comments  
ITS Section 5.0, Administrative Controls

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ITS 5.1, Responsibility

no comments

ITS 5.2, Organization

5.2-01            JFD 6  
                         ITS 5.2.1.c

Now that NMC is the license holder for Point Beach, the word “corporate” is not a potential point of confusion. Comment: Suggest using “specified Nuclear Management Corporation corporate officer” in place of STS’ “specified corporate officer.”

Licensee Response:

ITS 5.3, Facility Staff Qualifications

5.3-01            JFD 1, DOCs A1 and M1

ITS omits the STS 5.3.1 sentence, “The staff not covered by [Regulatory Guide 1.8] shall meet or exceed the minimum qualifications of [Regulations, Regulatory Guides, or ANSI Standards acceptable to the staff.]”

Comment: Confirm that the qualifications of all facility staff are covered by ANSI N18.1 - 1971, as supplemented by RG 1.8, Revision 1, September 1975, or adopt the STS sentence consistent with commitments of the current licensing basis.

Licensee Response:

ITS 5.4, Procedures

5.4-01            JFD 1

Comment: Adopt STS 5.4.1.b regarding emergency operating procedures consistent with the staff-accepted response to NUREG 0737 in the current licensing basis.

Licensee Response:

ITS 5.5, Programs and Manuals

5.5-01            DOC A3, A5  
                         CTS 15.7.8.3  
                         CTS 15.7.8.3.a, b, and c

ITS 5.5.1, ODCM, appears to omit some of the regulations and PBNP GDC, listed in CTS, for (1) the control of radioactive effluents, (2) the control of the release of and processing of waste materials, and (3) the assessment of radioactivity in the environs of PBNP. This omission seems to fit the LB-type DOC rather than an A-type DOC. Comment: Identify all such mis-categorizations in the admin controls section and provide suitable LB-type DOC(s).

Licensee Response:

5.5-02            DOC LA7, A6  
                         CTS 15.7.5.A  
                         CTS 15.7.8.7.B.4  
                         JFD 10 and 11  
                         ITS 5.5.11, Explosive Gas  
Monitoring Program

(1) The CTS’ procedural and oxygen limit requirements for the on-service gas decay tank will be controlled by §50.59 only if these requirements are placed in the TRM or the FSAR; a plant procedure or the explosive gas monitoring program manual itself is not good enough, unless CTS 7.8.7.B.4 is retained in the program description in ITS 5.5.11. (2) JFD 10 does not fully explain why the omitted words from STS 5.5.12 are not applicable to PBNP ITS 5.5.11. These words, if applicable, ought to be adopted. (3) ITS 5.5.11 omits a hydrogen concentration limit because CTS

Point Beach Nuclear Plant Units 1 and 2 Improved TS Review Comments  
ITS Section 5.0, Administrative Controls

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15.7.5 only has an oxygen limit. Since the actual oxygen limit is being placed outside TS, why not also require a hydrogen limit? What is the hydrogen limit? Comment: Revise the submittal to address these issues.

Licensee Response:

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5.5-03            CTS 15.3.13, Snubbers; split  
                      report  
                      CTS 15.4.2.B.3, IST of  
snubbers  
                      DOC LB5  
                      ITS 5.5.7

(1) The removal of the reference to snubbers in CTS 15.4.2.B.3 ought to be included with the relocation of the snubber requirements of CTS 15.3.13. (2) JFD 4 explains that IST “components” only include pumps and valves to justify replacing “components” with “pumps and valves.” What about snubbers? Comment: Revise submittal accordingly.

Licensee Response:

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Point Beach Nuclear Plant Units 1 and 2 Improved TS Review Comments  
ITS Section 5.0, Administrative Controls

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5.5-04            15.4.4.II  
                      STS 5.5.6 Pre-stressed  
Concrete Containment Tendon Surveillance  
Program  
  
                      JFD 5  
                      DOC LB 2

Omission of tendon surveillance requirements in the form of the program description as in the STS is beyond-scope because CTS contain such requirements. Reasons for the omission in DOC LB5 are insufficient.  
Comment: Adopt the STS 5.5.6 programmatic requirement.

Licensee Response:

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ITS 5.5.6 Reporting Requirements

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5.6-01            STS/ITS 5.6.1  
                      DOC A3  
                      STS markup Insert 5.0-3

The STS as revised by TSTF-152, R0, indicates that the ITS should explicitly describe the "special maintenance," not just use the term "special maintenance" in the list of examples of work and job functions.  
Comment: Review the intent of the STS' language and revise the ITS appropriately.

Licensee Response:

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5.6-02            not used

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5.6-03            DOC A6  
                      CTS 15.7.8.4.A.6

The referenced CTS is being deleted because it duplicates CTS 15.7.8.7, which according to DOC 5.5 LB1 is itself being deleted for duplication (with regulations). Thus, DOC A6 ought also to be an LB-type change.  
Comment: Revise the change classification of DOC A6.

Licensee Response:

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5.6-04            DOC A7  
                      CTS 15.6.9.1.B.2.d

Deletion of the referenced CTS is not administrative. It is less restrictive.  
Comment: Replace DOC A7 with an L-type DOC.

Licensee Response:

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5.6-05            DOC LA1 for CTS  
                      15.6.9.1.C.1  
                      DOC LA2 for CTS 15.6.9.2.B

The DOCs fail to state both the new location and controlling regulatory requirements for the information being removed from TS. Procedures do not have sufficient change control requirements to ensure proper control of the information being removed. Comment: Correct these and all other LA-type DOCs in the entire submittal that have this deficiency.

Licensee Response:

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5.6-06            DOC M3 & JFD 6 for COLR  
                      DOC M4 & JFD 6 for PTLR  
                      ITS 5.6.4 and 5.6.5

This comment is a placeholder for beyond scope items 97 (COLR) and 37a (PTLR). No response required pending approval of the proposed beyond-scope changes and the addition of these report requirements to the ITS.

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ITS 5.7 High Radiation Area

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no comments

Point Beach Nuclear Plant Units 1 and 2 Improved TS Review Comments  
ITS Section 5.0, Administrative Controls

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ITS 5.7 High Radiation Area

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no comments