

From: "Flentje, Fritzie" <Fritzie.Flentje@nmcco.com>
To: <PLL@nrc.gov> Patrick Loudon, RMT
Date: 09/26/2002 3:04:34 PM
Subject: NOV Response Clarification Letter

Here is the promised letter. It was signed out today.

<<NRC 2002-0086.pdf>>

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~~MT~~



Point Beach Nuclear Plant
6610 Nuclear Road
Two Rivers, WI 54242

NRC 2002-0086

10 CFR 2.201

September 26, 2002

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

Ladies/Gentlemen:

Dockets 50-266 and 50-301

Point Beach Nuclear Plant, Units 1 and 2

Clarification of Reply to a Notice Of Violation (EA-02-031)

NRC Special Inspection Reports. 50-266/01-17 (DRS); 50-301/01-17 (DRS)

By letter dated July 12, 2002, the Nuclear Regulatory Commission (NRC) forwarded the final results of its significance determination and Notice of Violation (NOV) for the Red finding identified in Inspection Reports 50-266/01-17 (DRS) and 50-301/01-17 (DRS). NMC replied to the NOV via letter dated August 12, 2002. In that letter we concurred with the violation of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings." NMC also acknowledged the aspect of the violation attributed to 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action."

During the week of September 23, 2002, a follow-up inspection was conducted by the NRC to determine whether the Red finding meets the guidelines of an old design issue as described in NRC Manual Chapter 0305. During the course of this inspection, it was recognized there was some ambiguity in our discussion regarding reclassification of the open function of the auxiliary feedwater pump recirculation flow valves to safety-related. This letter serves to clarify the identified ambiguity.

Reclassification of the open function of the recirculation flow control valves as safety-related provides greater assurance that minimum flow will be available to provide internal auxiliary feedwater pump cooling. The pneumatic backup supply to the recirculation flow control valves is limited. Therefore, Point Beach will also continue to specify operator action to manually open these valves. Point Beach has one common recirculation flow path from all of the auxiliary feedwater pumps to the condensate storage tanks. Although not all of the recirculation flow path is safety-related, operability of the auxiliary feedwater pumps will be dependent upon the availability of the flow path to provide minimum recirculation flow. The open function of the recirculation valves was reclassified as safety-related on September 12, 2002.

A second question that arose during the course of the inspection was related to our plans to continue the use of PRA to enhance the safety of the facility. We stated that we plan to continue to factor PRA insights into both operating procedures and operator training. This action has already been fully implemented. We also stated, but did not define as a regulatory commitment, that the PRA update project is planned to be completed by 2004. To provide further assurance to the Commission of our intent regarding this project, the following commitment is made:

1. *The Point Beach PRA update project will be completed by the end of 2004.*

We trust these clarifications eliminate the potential ambiguity that were identified in our response to the NOV dated August 12, 2002.

Sincerely,



A. J. Cayia
Site Vice President

FAF/kmd

cc: NRC Regional Administrator
NRC Project Manager
Director, Office of Enforcement

NRC Resident Inspector
PSCW