

Title of Proposed Activity: Removal of Internals from AF-117 and Upgrade Open function of AFW pumps Mini-Recirc Valves to Safety-Related (MR 02-029)

Associated Reference(s) #: SCR 2002-0010-01, SCR 2002-0321 and 2002-0339; MR 01-144, AF-4007/4014 Backup Nitrogen Supply, MR 02-001, 1/2AF-4002 Backup Air Supply; EVAL 2002-005, Permanent Plant Changes to Address Simultaneous Failure of All AFW Pumps; FCR 02-019; SE 97-085, MR 97-038 AFW Motor Driven Pump Pressure Discharge Valve Modification; Fay Letter to NRC, NRC Bulletin 88-04, Potential Safety-Related Pump Loss, June 28, 1988; NPM 2002-0228, Designation Of Backup Pneumatics For AFW Mini- Recirculation Valves As Safety-Related, NRC 2002-0068, Point Beach Nuclear Plant, Units 1 and 2 Reply to a Notice Of Violation (EA-02-031) NRC Special Inspection Report No. 50-266/01-17 (DRS); 50-301/01-17 (DRS), NRC 2002-0086, Clarification of Reply to a Notice of Violation (EA-02-031) NRC Special Inspection Reports No. 50-266/01-17 (DRS); 50-301/01-17 (DRS)

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PART I (50.59/72.48) - DESCRIBE THE PROPOSED ACTIVITY AND SEARCH THE PLANT AND ISFSI LICENSING BASIS (Resource Manual 5.3.1)

NOTE: The "NMC 10 CFR 50.59 Resource Manual" (Resource Manual) and NEI 96-07, Appendix B, Guidelines for 10 CFR 72.48 Implementation should be used for guidance to determine the proper responses for 10 CFR 50.59 and 10 CFR 72.48 screenings.

I.1 Describe the proposed activity and the scope of the activity being covered by this screening. (The 10 CFR 50.59 / 72.48 review of other portions of the proposed activity may be documented via the applicability and pre-screening process requirements in NP 5.1.8.) Appropriate descriptive material may be attached.

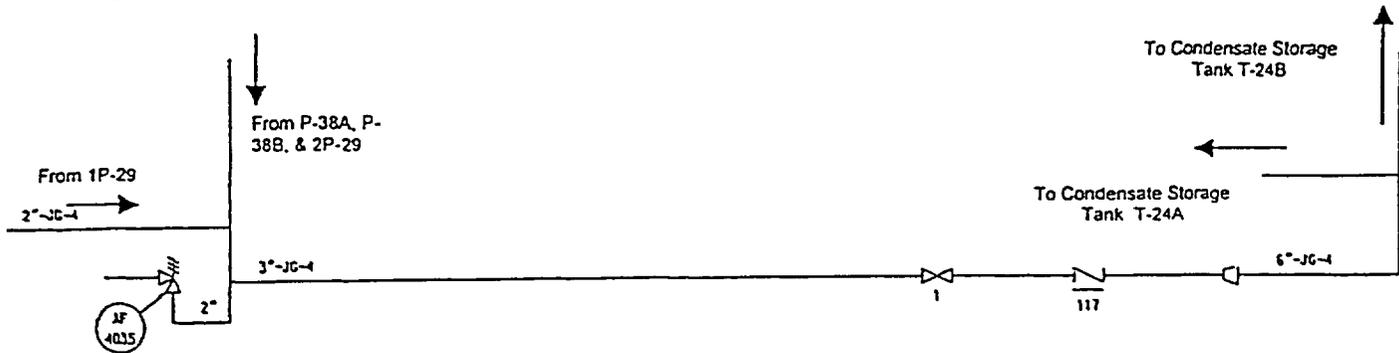
The scope of this screening involves the following activities associated with MR 02-029:

- Remove internals for AF-117, the Auxiliary Feedwater Pump Common Mini-Recirc Header Check Valve to prevent a common mode active failure in the recirc return header.
- Upgrade the open function for the air-operated Auxiliary feedwater pump mini-recirc valves (1(2)AF- 4002, AF-4007, AF-4014) to safety-related (also being done by IST group for inservice test procedure changes under screenings SCR 2002-0321 and 2002-0339). The check valves upstream of the AOVs (1/2AF-114, AF-115 and AF-116) are already classified as safety-related in CHAMPS; they will now have a safety function to open. Inservice test procedure changes to verify the open function of the check valves are supported by screenings SCR 2002-0321 and 2002-0339.
- The backup nitrogen and air supply systems installed under modifications MR 01-144 and MR 02-001 as reviewed under screening SCR 2002-0010-01 now have a safety-related support function to provide a pneumatic source to open or maintain open these valves (1(2)AF- 4002, AF-4007, AF-4014) in the event of loss of instrument air.
- State in the FSAR (FSAR 7.3, 9.7 and 10.2) and Technical Specification Bases (B 3.7.5) that (1) the open function for Auxiliary feedwater pump mini-recirc valves (1(2) AF-4002, AF-4007, AF-4014) is safety-related, and (2) the availability of a recirculation line downstream of the flow restricting orifices is required for AFW operability. The line downstream of the flow restricting orifices is not safety-related since failure of the line is conservative. The Bases will indicate that mini-recirculation flowpaths have to be available for the AFW system to be operable. Specific discussion of the check valves function to open will not be included in the FSAR because it can be inferred from the discussion of the AOVs (avoids excessive detail in the FSAR).

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A simplified P&ID of the mini-recirc header is shown below



EVAL 2002-005 evaluated permanent procedure changes that were implemented in response to a condition (CR 01-3595) that was identified where, with a procedure-directed operator action to control steam generator level (which could be accomplished by reducing flow through one or more AFW pumps), concurrent with a loss of instrument air (which would cause the AFW pumps' mini-recirculation valves to fail close), the potential existed for a simultaneous failure of the multi-stage high pressure AFW pumps due to very low or no flow through running AFW pumps. The procedure changes added instructions to the operators that if any AFW pump mini-recirc valve fails shut OR annunciator C01 A 1-9, INSTRUMENT AIR HEADER PRESSURE LOW is in alarm, then monitor and maintain minimum AFW flow or stop the affected AFW pump as necessary to control S/G levels. Minimum flow values for each pump were also included in the procedures. The majority of the changes were associated with EOP and ECA foldout pages. The procedures were initially revised as a compensatory measure to support AFW pump operability. The 50.59 evaluation reviewed the procedure changes as a permanent change to the procedures as described in the FSAR to confirm consistency with the licensing basis. The permanent procedure changes restored the AFW pumps to fully operable status.

This evaluation also was the basis for changes to the FSAR to clarify that the mini-recirculation valves require instrument air to function and that either a pump minimum flow is maintained or pumps are secured if the valve fails or instrument air is lost (FCR 02-019).

Screening SCR 2002-0010-01 reviewed modifications to provide backup air sources to all AFW pump minimum flow recirculation valves. These modifications were an enhancement that reduced the core damage probability from a loss of instrument air and increased the time for an operator to take manual action to override the valves open. Instrument air accumulator tanks were installed by MR 02-001 for the 1/2P-29 valves (1/2AF-4002), and the existing nitrogen backup system for the MDAFP discharge valves were tied in by MR 01-144 for the P-38A/B valves (AF-4007, AF-4014).

Point Beach has made an NRC commitment to upgrade the open function for all mini-recirc valves to safety-related as stated in NMC letter NRC 2002-0068:

"To further improve the future effectiveness of the AFW system by providing additional pump protection against low flow, Point Beach is classifying the open function of the pump recirculation flow control valves, as safety-related. This will provide a redundant method of providing for minimum AFW pump flow and consequently, pump cooling. As a result, testing and quality assurance requirements required for safety-related functions will be applied to the open function of these valves. As discussed previously, internal pump cooling is designed to be provided by minimum forward flow through the pumps. Classifying the recirculation flow control valves as safety-related will provide greater assurance that minimum flow will be available to provide internal pump cooling. The pneumatic backup supply to the recirculation flow control valves is limiting and therefore Point Beach will also continue to specify operator action to manually open these recirculation valves. Similar to other plants, Point Beach has one common recirculation flowpath from all the AFW pumps to the condensate storage tanks"

The scope of this screening also includes FSAR changes and Technical Specification Bases changes to coincide with the mini-recirculation safety upgrade described above

- 1.2 Search the PBNP Current Licensing Basis (CLB) as follows: Final Safety Analysis Report (FSAR), FSAR Change Requests (FCRs) with assigned numbers, the Fire Protection Evaluation Report (FPER), the CLB (Regulatory) Commitment Database, the Technical Specifications, the Technical Specifications Bases, and the Technical Requirements Manual. Search the ISFSI licensing basis as follows: VSC-24 Safety Analysis Report, the VSC-24 Certificate of Compliance, the CLB (Regulatory) Commitment Database, and the VSC-24 10 CFR 72.212 Site Evaluation Report. Describe the pertinent design function(s), performance requirements, and methods of evaluation for both the plant and for the cask/ISFSI as appropriate. Identify where the pertinent information is described in the above documents (by document section number and title). (Resource Manual 5.3.1 and NEI 96-07, App. B, B.2)

The Auxiliary Feedwater (AFW) system has the following functions described in the licensing basis:

- a. *To automatically start and ensure that adequate feedwater is supplied to the steam generators for heat removal during accidents which may result in a main steam safety valve opening (Loss of Normal Feedwater – including ATWS, and Loss of AC to the Station Auxiliaries).*
- b. *To automatically start and provide flow to maintain steam generator levels during accidents which require or result in rapid reactor coolant system cooldown (Steam Generator Tube Rupture and Rupture of a Steam Pipe).*
- c. *To allow the isolation of all lines to the ruptured steam generator in the SGTR event.*
- d. *To provide sufficient feedwater to remove decay heat from both units for one hour during a station blackout (SBO) event (TDAFP only).*
- e. *To provide sufficient flow to the steam generators to remove decay heat to achieve cold shutdown within 72 hours following a plant fire (Appendix R).*
- f. *To withstand a seismic event (i.e., the seismic Class 1 portions of the system) and to ensure that steam generator levels are maintained during a seismic event.*
- g. *To provide flow to the steam generators during plant startup and shutdown, and during hot shutdown or hot standby conditions for chemical additions and when operation of the main feedwater and condensate systems is not warranted.*

These modifications affect the operation of the minimum recirculation valves for the auxiliary feedwater pumps (1/2AF-4002, AF-4007, AF-4014). These valves have the following design functions:

1. *To isolate the minimum recirculation line to ensure that the auxiliary feedwater pumps deliver the required flow to the steam generators as needed to support the following accidents or events: LONF, LOAC, MSLB, SGTR, ATWS, Appendix R, and SBO.*
2. *To open to provide flow through the auxiliary feedwater pumps to prevent hydraulic instabilities and to dissipate pump heat.*
3. *To maintain the pressure boundary integrity of the auxiliary feedwater system.*

FSAR 10.2.2, System Design and Operation, states: "The auxiliary feedwater system consists of two electric motor-driven pumps; two steam turbine-driven pumps, pump suction and discharge piping, and the controls and instrumentation necessary for operation of the system. Redundancy is provided by utilizing two pumping systems, two different sources of power for the pumps, and two sources of water supply to the pumps. The system is categorized as seismic Class 1 and is designed to ensure that a single fault will not obstruct the system function."

CLB References:

*FSAR 7.2.3.2- Specific Control and Protection Interactions
FSAR 7.3.3.4 - Manual AFW Flow Control During Plant Shutdown
FSAR Section 7.4.1 – AMSAC
FSAR Section 10.1 - Steam and Power Conversion System
FSAR Section 10.2 – Auxiliary Feedwater
FSAR Figure 10.2-1 Sheet 1 – Bech M-217 Sh. 1 – Auxiliary Feedwater System
FSAR Figure 10.2-1 Sheet 2 – Bech M-217 Sh. 2 – Auxiliary Feedwater System
FSAR Section 14.1.10 – Loss of Normal Feedwater
FSAR Section 14.1.11 – Loss of All AC Power to the Station Auxiliaries
FSAR Section 14.2.4 – Steam Generator Tube Rupture
FSAR Section 14.2.5 – Rupture of a Steam Pipe
FSAR Appendix A 1 – Station Blackout
FCR 02-019
FPER 5.2.2 – Safe Shutdown Systems and Equipment*

FPER 5.2.5.2.3 – Auxiliary Feedwater Pump Room
Tech Spec 3.7.5 – Auxiliary Feedwater
Tech Spec Bases B 3.7.5 – Auxiliary Feedwater
NRC 2002-0068, Point Beach Nuclear Plant, Units 1 and 2 Reply to a Notice Of Violation (EA-02-031) NRC Special Inspection Report No. 50-266/01-17 (DRS); 50-301/01-17 (DRS)

I.3 Does the proposed activity involve a change to any Technical Specification? Changes to Technical Specifications require a License Amendment Request (Resource Manual Section 5.3.1.2).

Technical Specification Change : Yes No

If a Technical Specification change is required, explain what the change should be and why it is required.

I.4 Does the proposed activity involve a change to the terms, conditions or specifications incorporated in any VSC-24 cask Certificate of Compliance (CoC)? Changes to a VSC-24 cask Certificate of Compliance require a CoC amendment request.

Yes No

If a storage cask Certificate of Compliance change is required, explain what the change should be and why it is required.

----- 10 CFR 50.59 SCREENING -----

PART II (50.59) - DETERMINE IF THE CHANGE INVOLVES A *DESIGN FUNCTION* (Resource Manual 5.3.2)

Compare the proposed activity to the relevant CLB descriptions, and answer the following questions:

YES	NO	QUESTION
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Does the proposed activity involve Safety Analyses or structures, systems and components (SSCs) credited in the Safety Analyses?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Does the proposed activity involve SSCs that support SSC(s) credited in the Safety Analyses?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Does the proposed activity involve SSCs whose failure could initiate a transient (e.g., reactor trip, loss of feedwater, etc.) or accident, <u>OR</u> whose failure could impact SSC(s) credited in the Safety Analyses?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Does the proposed activity involve CLB-described SSCs or procedural controls that perform functions that are required by, or otherwise necessary to comply with, regulations, license conditions, orders or technical specifications?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Does the activity involve a <i>method of evaluation</i> described in the FSAR?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Is the activity a <i>test or experiment</i> ? (i.e., a non-passive activity which gathers data)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Does the activity exceed or potentially affect a <i>design basis limit for a fission product barrier (DBLFPB)</i> ? (NOTE: If <u>THIS</u> questions is answered <u>YES</u> , a 10 CFR 50.59 Evaluation is required.)

If the answers to ALL of these questions are NO, mark Part III as not applicable, document the 10 CFR 50.59 screening in the conclusion section (Part IV), then proceed directly to Part V - 10 CFR 72.48 Pre-screening Questions.

If any of the above questions are marked YES, identify below the specific design function(s), method of evaluation(s) or DBLFPB(s) involved.

1. The AF-117 check valve has an implicit function to open to allow minimum recirculation flow from the auxiliary feedwater pumps to return to the condensate storage tank(s). There is no direct discussion of this function in the licensing basis, other than that the valve appears in FSAR Figure 10 2-1.

A search of plant documents did not yield any reference to a need for valve AF-117 to close (or remain closed). The following uses were considered as possible functions for the closed position:

- a. To prevent backflow of heating steam condensate from entering the mini-recirculation return header. Given that the mini-recirculation header is not drained and remains filled with water during and after pump operation, migration of heating steam condensate into the header in any significant amounts is unlikely. Further, the plant no longer returns heating steam condensate to the condensate storage tank because of water quality concerns, and it is extremely unlikely that this plant design feature will ever be used again. Regardless, this reason for preventing back flow does not constitute a licensing basis design function. Therefore this function will not be evaluated for adverse effects.
 - b. To prevent backflow and siphoning of water from the condensate storage tanks through AF-4035 in the event that this valve opens due to high pressure in the line, or due to a break in the header. The valve's nominal relief setting is 50 psi. For AF-4035 to open, either an event occurs where multiple pumps start with high recirc flowrates and pressurize the line, or there is a blockage in the line. The safety-related flow restricting orifices in the recirc line from each AFW pump limit the flow and pressure from each pump. Further, if the line is blocked either by mispositioning of manual valves or failure of the check valve to open, there is no flowpath for backflow. The only credible way for the header to break is during a seismic event, in which case water from the condensate storage tank cannot be credited for accident mitigation. The prevention of backflow from the condensate storage tanks cannot be considered a licensing basis design function. Therefore this function will not be evaluated for adverse effects
2. The minimum recirculation valves for the auxiliary feedwater pumps (1/2AF- 4002, AF-4007, AF-4014) have the design functions to isolate the minimum recirculation line to ensure that the auxiliary feedwater pumps deliver the required flow to the steam generators as needed to support the mitigation of accidents or events. The proposed activity is to make the open function for these valves and the associated pump-side check valves a safety-related function. The new components for modifications MR 02-001 and MR 01-144 as discussed above were installed safety-related due to their risk significance. These components were classified safety-related based on a PBNP management decision, as described in NPM 2002-0228. These modifications ensure a safety-related supply of air or nitrogen to ensure that the auxiliary feedwater pumps have adequate cooling.

PART III (50.59) - DETERMINE WHETHER THE ACTIVITY INVOLVES ADVERSE EFFECTS (Resource Manual 5.3.3)

If ALL the questions in Part II are answered NO, then Part III is NOT APPLICABLE.

Answer the following questions to determine if the activity has an *adverse effect* on a design function. Any YES answer means that a 10 CFR 50.59 Evaluation is required, EXCEPT where noted in Part III.3.

III.1 CHANGES TO THE FACILITY OR PROCEDURES

YES NO QUESTION

- | | | |
|--------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Does the activity adversely affect the <i>design function</i> of an SSC credited in safety analyses? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Does the activity adversely affect the method of performing or controlling the <i>design function</i> of an SSC credited in the safety analyses? |

If any answer is YES, a 10 CFR 50.59 Evaluation is required. If both answers are NO, describe the basis for the conclusion (attach additional discussion as necessary):

1. The only function identified for the AF-117 check valve was to open to allow mini-recirculation water from AFW pumps to return to the condensate storage tank. It has no design function to close. Therefore removing the check valve internals has no adverse effect on the open function and precludes the valve from failing to open
2. The change in designation of the open function of mini-recirculation valves 1/2AF- 4002, AF-4007, AF-4014 as safety-related has no adverse affect on the valve's function to open or close. The open function was a design function described in the FSAR. Designating the open function as safety-related requires addition quality control and testing and should, therefore, make the open functions of the valve more reliable. The necessary backup air/nitrogen supplies were installed as safety-related so no additional physical changes to the plant are required. SCR 2002-0010-01 assessed the installation of these backup pneumatic supplies on the close function of the valves and no adverse effects were identified. Therefore there is no adverse effect on the functions of these valves.

- 3 Changes will be made in the FSAR to state that the open function for all Auxiliary feedwater pump mini-recirc valves is safety-related. The Technical Specification Bases will indicate that the mini-recirculation flowpaths have to be OPERABLE for the AFW system to be operable. These changes only reflect the activities discussed above, which have already been assessed and determined that there is no adverse effect on a design function. FSAR changes will also be made to reflect the recirculation line downstream of the flow restricting orifices has a safety function and is required for AFW operability, but the line is not safety-related since failure of the line is conservative. No physical changes were made to this line. If the line fails, a break or opening will be created which may increase overall flow through the recirculation line. The service-water system is the safety-related water supply for the AFW system. The loss of CST inventory due to the line failing and recirculation water spilling only affects the non-safety-related water source for the AFW system. The required minimum CST water is based on the station blackout(SBO) event; SBO is not an event that would cause this line to fail (open). Therefore, based on the above, the licensing basis documents changes do not have an adverse effect on any design functions.

III.2 CHANGES TO A METHOD OF EVALUATION

(If the activity does not involve a method of evaluation, these questions are NOT APPLICABLE.)

YES NO QUESTION

- Does the activity use a revised or different method of evaluation for performing safety analyses than that described in the CLB?
- Does the activity use a revised or different method of evaluation for evaluating SSCs credited in safety analyses than that described in the CLB?

If any answer is YES, a 10 CFR 50.59 Evaluation is required. If both answers are NO, describe the basis for the conclusion (attach additional discussion, as necessary).

III.3 TESTS OR EXPERIMENTS

If the activity is not a test or experiment, the questions in III.3.a and III.3.b are NOT APPLICABLE.

a. Answer these two questions first:

YES NO QUESTION

- Is the proposed test or experiment bounded by other tests or experiments that are described in the CLB?
- Are the SSCs affected by the proposed test or experiment isolated from the facility?

If the answer to BOTH questions in V.3.a is NO, continue to III.3.b. If the answer to EITHER question is YES, then describe the basis.

b. Answer these additional questions ONLY for tests or experiments which do NOT meet the criteria given in III.3.a above. If the answer to either question in III.3.a is YES, then these three questions are NOT APPLICABLE.

YES NO QUESTION

- Does the activity utilize or control an SSC in a manner that is outside the reference bounds of the design bases as described in the CLB?
- Does the activity utilize or control an SSC in a manner that is inconsistent with the analyses or descriptions in the CLB?

- Does the activity place the facility in a condition not previously evaluated or that could affect the capability of an SSC to perform its intended functions?

If any answer in III.3.b is YES, a 10 CFR 50.59 Evaluation is required. If the answers in III.3.b are ALL NO, describe the basis for the conclusion (attach additional discussion as necessary):

Part IV - 10 CFR 50.59 SCREENING CONCLUSION (Resource Manual 5.3.4).

Check all that apply:

A 10 CFR 50.59 Evaluation is required or NOT required.

A Point Beach FSAR change is required or NOT required. If an FSAR change is required, then initiate an FSAR Change Request (FCR) per NP 5.2.6.

A Regulatory Commitment (CLB Commitment Database) change is required or NOT required. If a Regulatory Commitment Change is required, initiate a commitment change per NP 5.1.7.

A Technical Specification Bases change is required or NOT required. If a change to the Technical Specification Bases is required, then initiate a Technical Specification Bases change per NP 5.2.15.

A Technical Requirements Manual change is required or NOT required. If a change to the Technical Requirements Manual is required, then initiate a Technical Requirements Manual change per NP 5.2.15.

----- 10 CFR 72.48 SCREENING -----

NOTE: NEI 96-07, Appendix B, Guidelines for 10 CFR 72.48 Implementation should be used for guidance to determine the proper responses for 72.48 screenings.

PART V (72.48) - 10 CFR 72.48 INITIAL SCREENING QUESTIONS

Part V determines if a full 10 CFR 72.48 screening is required to be completed (Parts VI and VII) for the proposed activity.

YES NO QUESTION

- Does the proposed activity involve IN ANY MANNER the dry fuel storage cask(s), the cask transfer/transport equipment, any ISFSI facility SSC(s), or any ISFSI facility monitoring as follows: Multi-Assembly Sealed Basket (MSB), MSB Transfer Cask (MTC), MTC Lifting Yoke, Ventilated Concrete Cask (VCC), Ventilated Storage Cask (VSC), VSC Transporter (VCST), ISFSI Storage Pad Facility, ISFSI Storage Pad Data/Communication Links, or PPCS/ISFSI Continuous Temperature Monitoring System?
- Does the proposed activity involve IN ANY MANNER SSC(s) installed in the plant specifically added to support cask loading/unloading activities, as follows: Cask Dewatering System (CDW), Cask Reflood System (CRF), or Hydrogen Monitoring System?
- Does the proposed activity involve IN ANY MANNER SSC(s) needed for plant operation which are also used to support cask loading/unloading activities, as follows: Spent Fuel Pool (SFP), SFP Cooling and Filtration (SF), Primary Auxiliary Building Ventilation System (VNPAB), Drumming Area Ventilation System (VNDRM), RE-105 (SFP Low Range Monitor), RE-135 (SFP High Range Monitor), RE-221 (Drumming Area Vent Gas Monitor), RE-325 (Drumming Area Exhaust Low-Range Gas Monitor), PAB Crane, SFP Platform Bridge, Truck Access Area, or Decon Area?
- Does the proposed activity involve a change to Point Beach CLB design criteria for external events such as earthquakes, tornadoes, high winds, flooding, etc.?
- Does the activity involve plant heavy load requirements or procedures for areas of the plant used to support cask loading/unloading activities?

Does the activity involve any potential for fire or explosion where casks are loaded, unloaded, transported or stored?

If ANY of the Part V questions are answered YES, then a full 10 CFR 72.48 screening is required and answers to the questions in Part VI and Part VII are to be provided. If ALL the questions in Part V are answered NO, then check Parts VI and VII as not applicable. Complete Part VIII to document the conclusion that no 10 CFR 72.48 evaluation is required.

PART VI (72.48) - DETERMINE IF THE CHANGE INVOLVES A ISFSI LICENSING BASIS *DESIGN FUNCTION*

(If ALL the questions in Part V are NO, then Part VI is NOT APPLICABLE.)

Compare the proposed activity to the relevant portions of the ISFSI licensing basis and answer the following questions:

YES	NO	QUESTION
<input type="checkbox"/>	<input type="checkbox"/>	Does the proposed activity involve cask/ISFSI Safety Analyses or plant/cask/ISFSI structures, systems and components (SSCs) credited in the Safety Analyses?
<input type="checkbox"/>	<input type="checkbox"/>	Does the proposed activity involve plant, cask or ISFSI SSCs that support SSC(s) credited in the Safety Analyses?
<input type="checkbox"/>	<input type="checkbox"/>	Does the proposed activity involve plant, cask or ISFSI SSCs whose function is relied upon for prevention of a radioactive release, <u>OR</u> whose failure could impact SSC(s) credited in the Safety Analyses?
<input type="checkbox"/>	<input type="checkbox"/>	Does the proposed activity involve cask/ISFSI described SSCs or procedural controls that perform functions that are required by, or otherwise necessary to comply with, regulations, license conditions, CoC conditions, or orders?
<input type="checkbox"/>	<input type="checkbox"/>	Does the activity involve a <i>method of evaluation</i> described in the ISFSI licensing basis?
<input type="checkbox"/>	<input type="checkbox"/>	Is the activity a <i>test or experiment</i> ? (i.e., a non-passive activity which gathers data)
<input type="checkbox"/>	<input type="checkbox"/>	Does the activity exceed or potentially affect a cask <i>design basis limit for a fission product barrier (DBLFPB)</i> ? (NOTE: If <u>THIS</u> questions is answered <u>YES</u> , a 10 CFR 72.48 Evaluation is required.)

If the answers to ALL of these questions are NO, mark Parts VII as not applicable, and document the 10 CFR 72.48 screening in the conclusion section (Part VIII).

If any of the above questions are marked YES, identify below the specific design function(s), method of evaluation(s) or DBLFPB(s) involved.

PART VII (72.48) - DETERMINE WHETHER THE ACTIVITY INVOLVES ADVERSE EFFECTS (NEI 96-07, Appendix B, Section B.4.2.1)

(If ALL the questions in Part V or Part VI are answered NO, then Part VII is NOT APPLICABLE.)

Answer the following questions to determine if the activity has an *adverse effect* on a design function. Any YES answer means that a 10 CFR 72.48 Evaluation is required; EXCEPT where noted in Part VII.3.

VII.1 Changes to the Facility or Procedures

YES	NO	QUESTION
<input type="checkbox"/>	<input type="checkbox"/>	Does the activity adversely affect the <i>design function</i> of a plant, cask, or ISFSI SSC credited in safety analyses?
<input type="checkbox"/>	<input type="checkbox"/>	Does the activity adversely affect the method of performing or controlling the <i>design function</i> of a plant, cask, or ISFSI SSC credited in the safety analyses?

If any answer is YES, a 10 CFR 72.48 Evaluation is required. If both answers are NO, describe the basis for the conclusion (attach additional discussion, as necessary):

VII.2 Changes to a Method of Evaluation

(If the activity does not involve a method of evaluation, these questions are NOT APPLICABLE.)

YES NO QUESTION

Does the activity use a revised or different method of evaluation for performing safety analyses than that described in a cask SAR?

Does the activity use a revised or different method of evaluation for evaluating SSCs credited in safety analyses than that described in a cask SAR?

If any answer is YES, a 10 CFR 72.48 Evaluation is required. If both answers are NO, describe the basis for the conclusion (attach additional discussion, as necessary):

VII.3 Tests or Experiments

(If the activity is not a test or experiment, the questions in VII.3.a and VII.3.b are NOT APPLICABLE.)

a. Answer these two questions first:

YES NO QUESTION

Is the proposed test or experiment bounded by other tests or experiments that are described in the cask ISFSI licensing basis?

Are the SSCs affected by the proposed test or experiment isolated from the cask(s) or ISFSI facility?

If the answer to both questions is NO, continue to VII.3.b. If the answer to EITHER question is YES, then briefly describe the basis.

b. Answer these additional questions ONLY for tests or experiments which do not meet the criteria given in VII.3 a above. If the answer to either question in VII.3.a is YES, then these three questions are NOT APPLICABLE:

YES NO QUESTION

Does the activity utilize or control an SSC in a manner that is outside the reference bounds of the design bases as described in the ISFSI licensing basis?

Does the activity utilize or control a plant, cask or ISFSI facility SSC in a manner that is inconsistent with the analyses or descriptions in the ISFSI licensing basis?

Does the activity place the cask or ISFSI facility in a condition not previously evaluated or that could affect the capability of a plant, cask, or ISFSI SSC to perform its intended functions?

If any answer in VII.3.b is YES, a 10 CFR 72.48 Evaluation is required. If the answers are all NO, describe the basis for the conclusion (attach additional discussion as necessary):

PART VIII - DOCUMENT THE CONCLUSION OF THE 10 CFR 72.48 SCREENING

Check all that apply:

A 10 CFR 72.48 Evaluation is required or NOT required. Obtain a screening number and provide the original to Records Management regardless of the conclusion of the 50.59 or 72.48 screening.

A VSC-24 cask Safety Analysis Report change is required or NOT required. If a VSC-24 cask SAR change is required, then contact the Point Beach Dry Fuel Storage group supervisor.

A Regulatory Commitment (CLB Commitment Database) change is required or NOT required. If a Regulatory Commitment Change is required, initiate a commitment change per NP 5.1.7.

A change to the VSC-24 10 CFR 72.212 Site Evaluation Report is required or NOT required. If a VSC-24 10 CFR 72.212 Site Evaluation Report change is required, then contact the Point Beach Dry Fuel Storage group supervisor.