

NRC 2003-0045

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May 19, 2003

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

DOCKETS 50-266 AND 50-301  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2  
REVIEW OF PRELIMINARY ACCIDENT SEQUENCE PRECURSOR ANALYSIS OF  
NOVEMBER 2001 OPERATIONAL CONDITION (TAC NO. MB7832)

By letter dated March 13, 2003, the Nuclear Regulatory Commission (NRC) requested that Nuclear Management Company, LLC (NMC) review the Preliminary Accident Sequence Precursor (ASP) Program analysis for operational conditions, which were discovered at Point Beach Nuclear Plant (PBNP). In response, we reviewed the Preliminary Precursor ASP Program analysis for the Point Beach potential common mode failure of all auxiliary feedwater pumps, due to Instrument Air failure, that was identified in November 2001.

The method used in the NRC calculation was significantly different from the method employed by plant staff for a plant specific analysis. However, most of the results are in the same range as would be expected from a plant specific analysis. Therefore, our comments do not include adjustments to the methodology used that do not result in a different conclusion than would have been identified in a plant specific analysis. Specific errors and suggested changes are provided below. All references are to Enclosure 1 of the NRC's March 13, 2003 letter.

1. Page 1 - AFW pumps are listed as P39A and P39B. The correct designations are P38A and P38B.
2. Page 2; 2nd paragraph - The 'Importance' section states that, "the pumps' discharge valves fail closed..." following loss of Instrument Air (IA). The phrase should state that "the pumps' recirculation valves fail closed..."
3. Page 3 - 'Seismic event': States that IA was assumed failed due to soldered joint failure. The analysis was not this detailed. The assumption was actually based upon the vast piping network that went through non-seismic structures that included block walls. This comment also applies to page 5 under 'Sequences of Interest'.
4. Page 6; 6th bulleted item - Operators fail to recover instrument air pressure in time before initiation of feed and bleed should include 'seismic' as an initiator, but should not include 'loss of offsite power' (LOOP).
5. Page 6; 7th bulleted item - Should read, "Main Feed Water not available with a loss of Service Water (SW) due to its dependency on Service Water in addition to the subsequent loss of IA with a loss of SW."
6. Page 7; 4th bulleted item - Should read, "No credit for recovery of secondary cooling without instrument air or service water."

In both the PBNP and NRC ASP analyses, no credit was taken for operators discovering the closed recirculation valve. This remains a bounding assumption in that some uncertainty remains in the operators' ability to diagnose the pump failure and take action to prevent additional pump failure. Factors affecting this are the short duration between pump failures and the high stress following the first and second pump failures.

Please contact Mr. James Masterlark of my staff at 920-755-7591 with any questions regarding our response.



A. J. Cayia  
Site Vice President

JG/kmd

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