

June 25, 2004

NRC 2004-0064
10 CFR 50.54(q)

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
License Nos. DPR-24 and DPR-27

Proposed Emergency Plan and Emergency Plan Implementing Procedure Changes
Upgrading Point Beach Nuclear Plant Emergency Action Levels To NEI 99-01 Rev. 4

In accordance with the requirements of 10 CFR 50.54(q), Nuclear Management Company, LLC (NMC), is submitting the enclosed proposed changes to the Point Beach Nuclear Plant (PBNP) Emergency Preparedness Program. The proposed changes to Emergency Plan Implementing Procedure (EPIP) 1.2, Emergency Classification, EPIP 1.2.1, Emergency Action Levels Technical Basis, and EP Appendix B, Emergency Classification, are submitted for prior Nuclear Regulatory Commission (NRC) review and approval.

As discussed with the NRC inspection team during the Inspection Procedure (IP) 95003 inspection conducted at PBNP in August 2003, NMC is upgrading the PBNP Emergency Action Level (EAL) scheme to Nuclear Energy Institute (NEI) 99-01, "Methodology for Development of Emergency Action Levels," Revision 4.

Enclosure I provides the PBNP EAL scheme as it currently exists in EP Appendix B and EPIP 1.2, marked up to show the proposed changes.

Enclosure II provides the revised (clean) procedures. The proposed EP Appendix B replaces the former emergency classification chart with three new emergency classification charts, one for all plant conditions, one for hot shutdown (RCS > 200 °F) and one for cold conditions (RCS ≤ 200 °F). The proposed EPIP 1.2 Attachment A contains revised EALs, upgraded from the NUREG 0654 basis to reflect the NEI 99-01 scheme and the proposed EAL overview matrix. EPIP 1.2.1 provides the technical basis for each EAL.

Enclosure III contains the EAL Technical Basis Document, which provides an explanation and basis for each EAL included in the EAL upgrade program. Enclosure III

also includes a word list, the number of deviations, and the NEI-to-PBNP EAL cross-reference matrix.

The proposed changes have been reviewed by the affected state and county government agencies. Enclosure IV contains the signed letters of agreement by the state and county officials. Enclosure IV also includes various resource materials contained on three CD-ROMS, EAL validation, and a cross-reference document matrix.

The commitment to revise the PBNP EALs to NEI 99-01 Rev. 4 was made as a result of a violation identified during the NRC's IP 95003 inspection at PBNP and is required by the Confirmatory Action Letter. During conference calls between NRC staff and NMC personnel on January 7, January 15, and June 15, 2004, the staff discussed this proposed submittal and NMC requested expedited review and approval. Based on these discussions, NMC requests NRC review and approval of these changes by March 2005.

This submittal contains no new regulatory commitments and no revisions to existing commitments.



Dennis L. Koehl
Site Vice-President, Point Beach Nuclear Plant
Nuclear Management Company, LLC

Enclosures: I - Current EAL Scheme
 II - Proposed EALs
 III - Technical Basis Document
 IV - EAL Resource Material (including 3 CD-ROMS)

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