

September 29, 2004

NRC 2004-0102
GL 2003-01

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

Generic Letter 2003-01: Control Room Habitability – Supplemental Response and Commitment Change

References: (1) Letter from NMC to NRC dated August 11, 2003 (NRC 2003-0070)
(2) Letter from NMC to NRC dated December 5, 2003 (NRC 2003-0116)

In Reference 1, Nuclear Management Company, LLC (NMC) provided the 60-day response to Generic Letter (GL) 2003-01, "Control Room Habitability," for the Point Beach Nuclear Plant (PBNP). Reference 2 provided the preliminary results for unfiltered in-leakage into the control room as less than 100 SCFM while the Control Room Ventilation System is operating in the emergency mode assumed in the radiological accident analysis. Reference 2 also supplemented the GL 2003-01 response with the following two commitments.

1. NMC will supply the final Control Room Envelope (CRE) in-leakage results to the NRC as required to support any licensing actions. The formal response to GL 2003-01, item 1(a), will be provided no later than September 2004.
2. NMC will provide technical specification changes to reference an acceptable surveillance methodology (and plans for any associated plant modifications to the CRE) to support requested information in GL 2003-01, item (c), for PBNP by September 2004.

As part of the response to the issues in GL 2003-01, new radiological dose analyses, based on the Alternative Source Term (AST) methodology, were developed for PBNP. The revised analyses were premised on reducing reliance on the use of KI to the extent practicable, while maintaining an operational margin for unfiltered air inleakage into the control room. The postulated accidents were analyzed such that reliance on KI was restricted to only the loss of coolant accident (LOCA).

Following discussions with NRC staff on September 24, 2004, NMC has decided to perform additional analyses to further reduce reliance on KI. In order to meet the control room dose acceptance criteria without reliance on KI in conjunction with AST, the PBNP dose analysis may need to use lower, more realistic, assumed values for other operating parameters (e.g., emergency core cooling system leakage) rather than the assumptions stated in the AST methodology guidance (Regulatory Guide 1.183). The additional analysis that needs to be performed, and the subsequent confirmatory reviews, necessitates that the response submittal date be extended. Additionally, the Technical Specification Task Force (TSTF) 448 traveler on control room habitability, which would provide the guidance for technical specification changes, has not yet been approved by NRC. Therefore, NMC is extending the submittal date of the information stated above.

Summary of Commitments

1. NMC will supply the final Control Room Envelope (CRE) in-leakage results to the NRC as required to support any licensing actions. The formal response to GL 2003-01, item 1(a), will be provided no later than 120 days following NRC approval of TSTF-448.
2. NMC will provide technical specification changes to reference an acceptable surveillance methodology (and plans for any associated plant modifications to the CRE) to support requested information in GL 2003-01, item (c), for PBNP no later than 120 days following NRC approval of TSTF-448.

The revised commitments are similar to those made by other NMC plants in response to GL 2003-01.



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

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