

November 10, 2004

Mr. Dennis L. Koehl
Site Vice President
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2, LICENSE RENEWAL
APPLICATION

Dear Mr. Koehl:

By letter dated February 25, 2004, Nuclear Management Company, LLC, (NMC or the applicant) submitted an application pursuant to 10 CFR Part 54, to renew the operating licenses for Point Beach Nuclear Plant (PBNP), Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC). The NRC staff is reviewing the information contained in the license renewal application (LRA) and has identified, in the enclosure, areas where additional information is needed to complete the review.

These RAIs were discussed with Mr. Jim Knorr of your staff and a mutually agreeable date for this response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-2232 or email MJM2@nrc.gov.

Sincerely,

/RA/

Michael J. Morgan, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos.: 50-266 and 50-301

Enclosure: As stated

cc w/encls: See next page

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ADAMS Accession no.: **ML043170663**

Document Name: E:\Filenet\ML043170663.wpd

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Point Beach Nuclear Plant, Units 1 and 2

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DISTRIBUTION: Ltr. To D. Koehl, Re: RAI for the Review Re: Point Beach Nuclear Plant, Units 1 and 2, Dated: November 10, 2004, Adams Accession no.: **ML043170663**

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POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION (LRA)
REQUESTS FOR ADDITIONAL INFORMATION (RAIs)

Section 2.3.3 Auxiliary Systems

2.3.3.2 Component Cooling Water System Requests for Additional Information (RAIs)

RAI 2.3.3.2-1

The Point Beach Updated Final Safety Analysis Report (PBNP UFSAR) Section 9.1 states that the CCW system removes heat from the Reactor Coolant Pump (RCP) thermal barrier cooling coils to ensure RCS integrity. License renewal drawing LR-110E029 Sheet 2 (in quadrants B-5 and B-8) Note 3 and drawing LR-110E018 Sheet 2 (quadrants B-5 and B-8) Note 6 indicate a Swagelock 1 ¼" DIA. S.S. Flexible Metal Hose is used as a piping component on the inlet and outlet of the RCPs. This flexible metal hose is shown on the drawings as within the scope of license renewal. If these hoses have been screened in and included as passive components then Table 3.3.2-2 Auxiliary Systems - Component Cooling Water System - Summary of Aging Management Evaluation should have included an entry for stainless steel piping and fittings in this environment. No such entry could be found. Therefore, it is not clear if these flexible metal hose connectors are included in Table 2.3.3-2 as part of the piping and fittings component group. A degraded flexible metal hose connector could adversely impact the pressure boundary function of the CCW system. Provide additional clarification on these flexible metal hose connectors as to whether they are included in Table 2.3.3-2 as part of the piping and fittings component group and are considered to be in-scope for license renewal and subject to an AMR.

2.3.3.3 Spent Fuel Pool Cooling System RAIs

RAI 2.3.3.3 - 1

The PBNP UFSAR Section 9.9.2 System Design and Operation (Paragraph 2) states, "The spent fuel pool cooling system piping and service water system piping supplying the spent fuel pool heat exchangers are classified Safety-Related, Seismic Class I." The spent fuel pool license renewal drawing LR-110E018 Sheet 4 (quadrant H-5) shows the service water discharge piping from the spent fuel pool cooling heat exchangers (HX-13A and HX-13B) downstream of the flow control valves as out-of-scope. This is inconsistent with the Service Water license renewal drawing LR-M-207, Sheet 3 that shows the piping downstream of the discharge flow control valves as in-scope. Clarify whether this section of service water piping at the boundaries of the Spent Fuel Pool Cooling system is in-scope or not. If this section of piping is not in-scope, provide justification for exclusion.

RAI 2.3.3.3 - 2

The spent fuel pool cooling piping network downstream of the heat exchanges has a branch going to out-of-scope piping and components leading from the skimmer pump. The license renewal drawing LR-110E018 Sheet 4 in quadrant F-2 shows the in-scope boundary stopping in the middle of a piping run and not including the skimmer pump discharge isolation valve 793A.

Other branch lines leading off of the Spent Fuel Pool System include at least one isolation valve in-scope. Failure of the out-of-scope piping or the out-of-scope skimmer pump system may affect the pressure boundary integrity intended function of this piping segment. Justify your determination to exclude the piping up to and including the 793A isolation valve body from the scope of license renewal.

2.3.3.5 Service Water System RAIs

RAI 2.3.3.5 - 1

The PBNP UFSAR Section 9.6 states that the Service Water (SW) system shall provide sufficient flow to support the heat removal requirements of components required to mitigate the consequences of a Loss of Coolant Accident (LOCA) in one unit, while supporting the normal flow of the unaffected unit. License renewal drawing LR-M-207 sheet 1A shows three pipe stubs without isolation valves off the SW pressure boundary (listed below) as not in-scope for license renewal. License renewal application section 2.3.3.5 states that the SW piping and fittings are in-scope as a pressure boundary. Failure of these sections of piping could affect the pressure boundary function of the SW system. Justify that the three piping areas listed below are not in-scope for license renewal and subject to an AMR.

- a. Cap on 4"-JB-2 piping, location G-5.
- b. Pipe stub and cap downstream of valve SW-48, location C-4.
- c. Pipe stub and cap downstream of valve SW-57, location D-4.

RAI 2.3.3.5 - 2

The PBNP UFSAR Section 9.6.1 states that the SW system shall provide sufficient flow to support the heat removal requirements of components required to mitigate the consequences of a Loss of Coolant Accident (LOCA) in one unit, while supporting the normal flow of the unaffected unit. License renewal drawing LR-M-207 Sheets 1, 2 & 3 show seven valve actuators (listed below) as out-of-scope for license renewal. License renewal application Section 2.3.3.5 states that the SW valve bodies are in-scope as a pressure boundary. The seven valve actuators are not shown in a manner that is consistent with other similar valves in the SW system. Clarify which portions of these valves (depicted below) have pressure boundary functions, and should be in-scope for license renewal and subject to an AMR.

- a. LR-M-207 Sheet 1 - Actuator for BS-2911, location G-3.
- b. LR-M-207 Sheet 2 - Actuator for valve SW-1-401G, location F-7.
- c. LR-M-207 Sheet 2 - Actuator for strainer Z-104A, location G-6.
- d. LR-M-207 Sheet 3 - Actuator for valve SW-12A, location E-9.
- e. LR-M-207 Sheet 3 - Actuator for valve TCV-12B, location E-7.
- f. LR-M-207 Sheet 3 - Actuator for valve TCV-12C, location E-7.
- g. LR-M-207 Sheet 3 - Actuator for valve SW-12D, location E-6.

RAI 2.3.3.5 - 3

The PBNP UFSAR Section 9.6.2 states that the SW system, serving both units, supplies cooling water to equipment in the steam plant, to the containment ventilation coolers and to

reactor auxiliary systems. Nonessential services in each unit receive water from their respective header (North or South). License renewal drawing LR-M-207 Sheet 2 shows equipment around strainer Z-104A as in-scope for license renewal. License renewal application Section 2.3.3.5 states portions of the SW system contain components subject to an AMR extend from pump bays to the Circulating Water discharge, including connections to the suction of the Auxiliary Feedwater pumps, or the Fire Protection system, including pumps, heat exchangers, strainers, piping and valves. The transition location from out-of-scope to in-scope is not clearly marked for the following two locations:

- a. LR-M-207 Sheet 2, 3"-JB-1, location F-6
- b. LR-M-207 Sheet 2, 6"-JB-1, location F-7

Provide additional information to clarify the exact locations of these two transitions and which sections are in-scope and which are out-of-scope for license renewal.

RAI 2.3.3.5 - 4

The PBNP UFSAR Section 9.6.1 states that the SW system shall provide sufficient flow to the spent fuel pool heat exchangers to provide adequate heat removal of spent fuel decay heat. On license renewal drawing LR-M-207 Sheet 3, the piping downstream of valve SW-750, at location C-7, the marking is not legible as to whether this piping is in-scope or out-of-scope. Provide additional information for this section of piping to clearly show which sections are in-scope and which are out-of-scope for license renewal.

RAI 2.3.3.5 - 5

The PBNP UFSAR Section 9.6 states that return from the SW system is directed to the return line of the Circulating Water system. License renewal drawing LR-M-207 Sheet 1 shows SW system piping 20"-JB-2 returning to the Circulating Water system as in-scope for license renewal. License renewal application Section 2.3.3.5 states much of the SW return header is not safety related, but was included in-scope up to manual isolation valves, per 10 CFR 54.4(a)(2) Criterion 2. The transition location from in-scope (Service Water) to out-of-scope (Circulating Water) is not clearly marked at the following two locations:

- a. LR-M-212 Sheet 1, 20"-JB-2, location F-8.
- b. LR-M-2212, 20"-JB-2, location A-7.

Provide additional information to clarify the exact locations of these two transitions to clearly show which sections are in-scope and which are out-of-scope for license renewal.

2.3.3.7 Heating Steam System RAIs

RAI 2.3.3.7-1

As described in the LRA, the Heating Steam system does not perform any safety-related functions. However, certain portions of the Heating Steam system are in-scope for License Renewal in accordance with 10 CFR 54.4(a)(2). Portions of the non-safety-related Heating Steam system in the PAB have the potential to affect the function of safety-related equipment.

License renewal drawing LR-M-214 Sheet 1 depicts heat exchangers HX-97A, HX-97B, HX-86A, HX-86B, HX-35A, HX-35B 1HX-77A and 1HX-77B as within the scope of license renewal. However, Table 2.3.3-7 does not indicate that Heating Steam system heat exchangers are components requiring an AMR. If the Heating Steam system heat exchangers are within the scope of license renewal as shown on the license renewal drawings, provide additional information or explain the reason for not including these heat exchangers in Table 2.3.3-7 and/or in Tables 3.3.2-15.

2.3.3.11 Treated Water System RAIs

RAI 2.3.3.11 - 1

The PBNP LRA Section 2.3.3.11 states the shear gate valves in the G01 and G02 rooms' oily sumps are within scope. In addition, the PBNP LRA states these are NSR SSC whose failure has an affect on the function of safety-related equipment and are therefore within scope. The PBNP LRA drawing LR-M-223 Sheet 3 at location F-2 indicates STP-15 and 14 are in the G02 room and are within scope. The shear gate valves for Room G01 could not be located on the license renewal drawings. Identify and/or provide additional information concerning the location of the shear gate valves associated with Room G01 that are called out in the PBNP LRA as within scope and subject to AMR in accordance with 10 CFR 54.21(a)(1).

RAI 2.3.3.11 - 2

The PBNP LRA states all non-safety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions identified within 10 CFR 54.4.(a)(1) (i), (ii), or (iii) shall be considered within scope of the LRA. Inconsistencies within the waste disposal system license renewal drawings were identified as follows: Piping segments identified on PBNP LRA drawing LR-PBM-231, Sheet 2 at locations B-3, D-4, and B-9; drawing LR-M-223, Sheet 3 at locations E-8 and H-8; and drawing LR-PBM-231, Sheet 1 at location B-3 are designated to be within scope; however, the basis for these determinations is not explained. If these piping segments can adversely impact the function of safety-related SSCs, identify these safety-related SSCs that could be impacted by these piping segments, and provide additional information and the drawing LR-PBM-231, Sheet 2, to allow verification that they have been properly identified to be within the scope of license renewal and subject to AMR in accordance with 10 CFR 54.21(a)(1).

2.3.3.12 Circulating Water System RAIs

RAI 2.3.3.12 - 1

The PBNP LRA Section 2.3.3.12 states that portions of the Circulating Water system are considered to be in-scope per 10 CFR 54.4(a)(2) Criterion 2 due to the potential for flooding or spray to affect the function of the safety related Service Water (SW) pumps. The Criterion 2 scoping results for portions of the Circulating Water system that are in-scope for license renewal are identified on drawing LR-PBM-232 at location D5. This drawing indicates that the chlorination piping to the SW pump pits to the suction of Circulating Pumps 2P-30A and 30B are in-scope; however, the same line to Circulating Pumps 1P-30A and 30B are shown as not in-scope. Provide the basis for not considering chlorination piping between isolation valves

CD-46 and 47 to the suction of Circulating Pumps 1P-30A and 30B in-scope for license renewal.

RAI 2.3.3.12 - 2

The PBNP LRA Section 2.3.3.12 states that portions of the Circulating Water system are considered to be in-scope per 10 CFR 54.4(a)(2) Criterion 2 due to the potential for flooding or spray to affect the function of the safety-related Service Water (SW) pumps. Drawings LR-M-212, Sheet 1 and LR-M-2212 show the portions of the Circulating Water system that are in-scope for license renewal. The scoping review in the LRA state that the pumps, discharge valves, expansion joints and associated piping within the CW pump house structure are in-scope; however, pressure taps (1PI3503 and 3504, and 1PI3503 and 3504) on the discharge of circulating water pumps 1-P30A and 30B and 2-P30A and 30B are not included in-scope. Provide additional information and technical justification for omitting the pressure taps (1PI3503 and 3504, and 1PI3503 and 3504) on the discharge of circulating water pumps 1-P30A and 30B and 2-P30A and 30B from the scope of license renewal.