November 17, 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 your staff, Mr. Jim Knorr, 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 e-mail 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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OFFICE	PM:RLEP	SC:RLEP
NAME	MMorgan	SLee
DATE	11/17/04	11/17/04

OFFICIAL RECORD COPY

Point Beach Nuclear Plant, Units 1 and 2

cc:

Jonathan Rogoff, Esq.
Vice President, Counsel & Secretary
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

Mr. Frederick D. Kuester
President and Chief Executive Officer
We Generation
231 West Michigan Street
Milwaukee, WI 53201

James Connolly
Manager, Regulatory Affairs
Point Beach Nuclear Plant
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

Mr. Ken Duveneck
Town Chairman
Town of Two Creeks
13017 State Highway 42
Mishicot, WI 54228

Chairman
Public Service Commission
of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
6612 Nuclear Road
Two Rivers, WI 54241

Mr. Jeffrey Kitsembel
Electric Division
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

David Weaver
Nuclear Asset Manager
Wisconsin Electric Power Company
231 West Michigan Street
Milwaukee, WI 53201

John Paul Cowan
Executive Vice President & Chief Nuclear
Officer
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

Douglas E. Cooper
Senior Vice President - Group Operations
Palisades Nuclear Plant
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043

Fred Emerson
Nuclear Energy Institute
1776 I Street, NW., Suite 400
Washington, DC 20006-3708

Roger A. Newton
3623 Nagawicka Shores Drive
Hartland, WI 53029

James E. Knorr
License Renewal Project
Nuclear Management Company, LLC
6610 Nuclear Road
Point Beach Nuclear Plant
Two Rivers, WI 54241

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

DISTRIBUTION: Ltr to D. Koehl, RAI for the Review of the point Beach Nuclear Plant, Units 1 & 2, ReL LRA Dated: November 17, 2004

Adams accession no.: **ML043270647**

HARD COPY
RLEP RF
Project Manager
E-MAIL:
RidsNrrDrip
RidsNrrDe
G. Bagchi
K. Manoly
W. Bateman
J. Calvo
R. Jenkins
P. Shemanski
J. Fair
RidsNrrDssa
RidsNrrDipm
D. Thatcher
R. Pettis
G. Galletti
C. Li
M. Itzkowitz (RidsOgcMailCenter)
R. Weisman
M. Mayfield
A. Murphy
S. Smith (srs3)
S. Duraiswamy
Y. L. (Renee) Li
RLEP Staff

L. Kozak, RIII
P. Lougheed, RIII
J. Strasma, RIII
A. Vegel, RIII
H. Chernoff
W. Ruland
C. Marco
L. Raghavan
T. Mensah
OPA

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

Aging Management Review for Reactor Coolant System and Pressurizer

RAI 3.1.2-1

In your LRA, you indicated that WCAP-14575-A and 14574-A was approved by the staff. Please indicate the dates of the approval letters/safety evaluation for the subject WCAPs.

RAI 3.1.2-2

In your LRA application, you indicated that meaningful volumetric inspection techniques did not exist for socket welds in the Class 1 piping. In light of the successful application of UT of socket welded joints in one inch piping at Susquehanna Steam Electric Station, please discuss the applicability for this technique at PBNP Units 1 and 2 to manage the aging effects of fatigue. If you determine that this application is not suitable for your plant, the discussion should describe in detail why this technique is not viable at PBNP Units 1 and 2, and the basis why no safety significant condition exists if not implemented.

RAI 3.1.2-3

In your plant specific response, item (10), Table 3.1.0-1, you indicated that plant process control procedures (design control, repair/replacement, and welding) will be revised to ensure that repair or replacement of Class 1 piping components welded connections or cast austenitic stainless steel (CASS) would require a new LBB analysis based on replacement process and/or material properties. Prior to that statement, you indicated that the subject LBB analyses had been revised addressing SG replacement, power uprate, and a 60-year operating period. Since these LBB analyses revisions typically address the effects of thermal aging on CASS components, please explain in detail why the revisions to the procedures are necessary. In your response, please advise if the revised LBB analyses address the effects of thermal aging on CASS components.

Secondly, if the revisions to the plant control procedures are required per your plant administrative program controls, please provide a commitment to your LRA that the subject revisions will be completed prior to the period of extended operation.

RAI 3.1.2-4

Under the plant-specific response in Table 3.1.0-3 for Renewal Applicant Action Item (4), you stated that absolute assurance could not be provided that the yield strength of your SA-193, Grade B7 bolting is under 150 ksi. Furthermore, you stated that since the Inservice Inspection database results show that no cracking is occurring, you do not consider SCC an aging effect requiring management for the Point Beach pressurizer bolting. Please explain in detail, the type, extent, and frequency of nondestructive examinations on this pressure retaining bolting performed at Point Beach under your Inservice Inspection Program.

RAI 3.1.2-5

In Tables 3.1.2-1 and 3.1.2-4, you indicate that the Water Chemistry Control AMP is used to manage the effects of loss of material due to corrosion in low flow and stagnant areas for a variety of stainless and cast stainless materials. These components are designated by Note H with footnotes 5 and 21. NUREG-1801, XI.M2 recommends a One-Time Inspection Program to validate the effectiveness of the Chemistry Control Program for low flow and stagnant areas because the mitigating effects of a Water Chemistry Control program are effective for intermediate and high-flow areas. Please discuss how the aging effect of loss of material for components specified under Note H of the two listed tables is managed for low flow/stagnant areas since NUREG-1801, XI.M2 specifies that the mitigating effects of a Chemistry Control Program alone is not sufficient.

Alloy 600 Program RAI

RAI 2.1.16-1

Please provide a commitment to assure that interim report "PWR Materials Reliability Project Interim Alloy 600 Safety Assessment for US PWR Plants (MRP-44), Part 1: Alloy 82/182 Pipe Butt Welds," and it's final version will be used as part of the basis for the Reactor Coolant System Alloy 600 Inspection Program. The commitment should state that the Reactor Coolant System Alloy 600 Inspection Program will be submitted 24 - 36 months prior to the period of extended operation for staff review and approval to determine if the program demonstrates the ability to manage the effects of aging per 10 CFR 50.54.21(a)(3).

RAI 2.1.16-2

Please discuss in detail your review of industry/plant operating experience and how it will equate to the continued operation of the existing PBNP Units 1 and 2 RPV heads. If the heads are to be replaced, please discuss your plans for the monitoring of the heads in accordance with current industry guidance, Owner's Groups activities and existing NRC regulations or Orders.

Leak Before Break TLAA

RAI 4.1.1-1

Please discuss whether there are any calculations or analyses at PBNP that address the topics listed in 4.1.1.1 of the application and were not included in Table 4.1-2 of the LRA.

RAI 4.1.1-2

In section 4.1.2, pursuant to 10 CFR 54.21(c)(2), a list of plant specific exemptions granted pursuant to 10 CFR 50.12 was provided. This section described the exemptions and why they were still needed. Pursuant to 10 CFR 54.21.(c)(2), please provide an evaluation that justifies the continuation of these exemptions for the period of extended operation.