

November 15, 2004

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10 CFR 54

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Point Beach Nuclear Plant, Units 1 and 2
Dockets 50-266 and 50-301
License Nos. DPR-24 and DPR-27

Recommended Corrections to NRC
Audit Trip Report Regarding the Point Beach Nuclear Plant
License Renewal Application
(TAC Nos. MC2099 and MC2100)

- Reference: 1) Letter from NMC to NRC dated February 25, 2004 (NRC 2004-0016)
2) Letter from NRC to NMC dated September 3, 2004, "Audit Trip Report Regarding the Nuclear Management Company, LLC, License Renewal Application for the Point Beach Nuclear Plant, Units 1 and 2, dated February 25, 2004."

In Reference 1, Nuclear Management Company, LLC (NMC), submitted the Point Beach Nuclear Plant (PBNP) Units 1 and 2 License Renewal Application (LRA). In Reference 2, the Nuclear Regulatory Commission (NRC) provided an Audit Trip Report discussing their review of the quality attributes for aging management programs, training for license renewal project personnel, and quality controls applied to the LRA development process.

The following recommended corrections are provided for your consideration. The Audit Report, Section 6, "Quality Assurance Controls on the LRA Scoping and Screening Methodology," third bullet stated, "The applicant developed a database for documenting license renewal information identified during scoping and screening evaluations. This database was considered the formal quality records of the LR implementation process and was controlled in accordance with written instructions." License Renewal technical reports that are printed from the database and reviewed by qualified personnel comprise the formal quality records for the project in accordance with written procedures.

The Audit Report, Section 6, fifth bullet stated, "The applicant conducted an informal assessment of the LRA dated December 18, 2003, which looked at areas that included Aging Management Programs and Operating Experience, Environmental Review, Time-Limited Aging Analysis, and Project Management. The assessment resulted in recommendations for the areas assessed and follow-up in the corrective action program." An informal self-assessment of the PBNP License Renewal Project was conducted in June and July of 2002 in preparation for a Quality Assurance Audit scheduled for August 2002. The areas assessed included the Integrated Plant Assessment Process, Aging Management Programs and Operating Experience, Time-Limited Aging Analyses, Environmental Review, License Renewal Application, and Project Management. The assessment resulted in recommendations for the areas assessed. The informal self-assessment report was subsequently revised several times to include the actions taken in response to the recommendations. Revision 3 of the informal self-assessment issued on December 18, 2003, documented all of the actions taken in response to the recommendations. The Quality Assurance Audit was conducted in August 2002 with all of the findings documented and tracked to closure in the corrective action program. The next Quality Assurance Audit is scheduled for first quarter 2005.

Should you have any questions concerning this submittal, please contact Mr. James E. Knorr at (920) 755-6863.

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the forgoing is true and correct. Executed on November 15, 2004.



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

Enclosures

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