

December 17, 2004

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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

Response to Request for Additional Information
Regarding the Point Beach Nuclear Plant License Renewal Application
(TAC Nos. MC2099 and MC2100)

By letter dated February 25, 2004, Nuclear Management Company, LLC (NMC), submitted the Point Beach Nuclear Plant (PBNP) Units 1 and 2 License Renewal Application (LRA). On November 17, 2004, the Nuclear Regulatory Commission (NRC) requested additional information regarding Auxiliary Systems – Ventilation (Sections 2.3.3.9 and 3.3.3.10 of the LRA). The enclosure to this letter contains the NMC's response to the staff's questions.

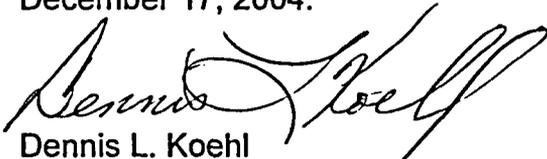
Should you have any questions concerning this submittal, please contact Mr. James E. Knorr at (920) 755-6863.

Summary of Commitments

This letter makes the following new commitment:

NMC will add line items to Table 3.3.2-9 to address the aging effects associated with the ventilation air intakes during the License Renewal Application annual update.

I declare under penalty of perjury that the forgoing is true and correct. Executed on December 17, 2004.



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

Enclosure

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

ENCLOSURE

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 LICENSE RENEWAL APPLICATION

The following information is provided in response to the Nuclear Regulatory Commission (NRC) staff's request for additional information (RAI) regarding the Point Beach Nuclear Plant (PBNP) License Renewal Application (LRA).

The NRC staff's questions are restated below, with the Nuclear Management Company (NMC) response following.

NRC Question RAI 2.3.3.9:

Containment Ventilation System (Containment Cooling Subsystem)

For Point Beach Units 1 and 2 Containment Cooling Subsystem, described on LRA drawing LR-215 SH-1 depicts containment cooling coils 1HX-15A/B/C/D and roughing filters 1F-45A/B/C/D and LRA drawing LR-2215 SH-1 depicts containment cooling coils 2HX-15A/B/C/D and roughing filters 2F-45A/B/C/D. None of the exhaust structures include screens within the scope of license renewal and subject to an aging management review (AMR). However, these cooling coil housings and roughing filter housings, including screens for intake and exhaust structures, are not listed in LRA Table 2.3.3-9, "Containment Ventilation System," nor LRA Table 3.3.2-8 "Auxiliary Systems-Containment Ventilation System-Summary of Aging Management Evaluation." Clarify whether these cooling coil housings and roughing filter housings, including screens for exhaust structures, are in the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to aging management review in accordance with 10 CFR 54.21(a)(1). If they are, they should be included in Table 2.3.3-9. If they are excluded from the scope of license renewal and not subject to an AMR, provide justification for the exclusion.

NMC Response:

The 1/2F-45A/B/C/D roughing filter housings are in-scope, subject to an Aging Management Review (AMR), and are included in the "Filters/Strainers" Component Type line item in Tables 2.3.3-9 and 3.3.2-8.

The 1/2HX-15A/B/C/D cooling coils are in-scope, subject to an AMR, and are included in the "Heat Exchanger" Component Type line item in Tables 2.3.3-9 and 3.3.2-8.

The screens for intake and exhaust were not included in-scope as they provide no license renewal intended function. The "expanded metal screen" that is referred to in

Section 6.3.2 of the Final Safety Analysis Report (FSAR) is part of the structure to hold the roughing filters in place. Screens or louvers on the exhaust ductwork are not mentioned in the PBNP Current Licensing Basis (CLB). The roughing filters are normally not installed, and the expanded metal screen therefore provides no license renewal intended function. Therefore, no credit is taken for the screens being installed; as such, they would have no license renewal intended function.

NRC Question RAI 2.3.3.10:

Essential Ventilation System

For Point Beach Units 1 and 2 Essential Ventilation System, described in LRA Section 2.3.3.10 and on LRA Drawings LR-M-143, LR-M-144, Sh.1, 2, and 3, LR-M-211, Sh.3, LR-M-214, Sh.4, LR-PBM-250, and LRA Tables 2.3.3-9, "Essential Ventilation System" and 3.3.2-9, "Auxiliary Systems-Essential Ventilation System-Summary of Aging Management Evaluation" do not contain all the components of the system as highlighted on the drawings. For example, while the tables list damper housings, duct work, fan/blower housings, etc., they do not list cooling coil housings for cooling coils HX-98 and HX-99, valve bodies for service water system control valves CV-2976 and CV-2977, coil housings for heating coils HX-91A/B and HX-92, direct expansion coils HX-190 A/B, coil HX-191A/B, nor filter housings for filters F16 and F-43, just to name a few. Also, none of the air intake or exhaust structures include screens within the scope of license renewal and subject to an AMR. Clarify whether these components and all other applicable components of the system, such as screens for intake and exhaust structures including duct sealants, wall sealants, pressure boundary sealants etc., are within the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to aging management review in accordance with 10 CFR 54.21(a)(1). If these components are in the scope of license renewal, update the LRA by providing the applicable information in the appropriate LRA tables. If these components are excluded from the scope of license renewal and not subject to an AMR, provide justification for the exclusion.

NMC Response:

As a general rule, the component types are generic terms, and can include many subcomponents of the generic component. For instance, the Component Type "Heat Exchangers" can include the shell or housing, the tubesheet, or the tubes, etc. The reason "Damper Housings" and "Fan/Blower Housings" were explicitly included is because these components are typically active and the LRA indicates the housing as a passive component subject to aging management.

In answer to specific component types addressed in the question:

- Cooling Coil/Heating Coil Housings are in-scope, subject to aging management, and already included within the existing "Heaters/Coolers" Component Type (see Table 3.3.2-9).

- The valve bodies for the Service Water control valves are in-scope, subject to aging management, and already included in the Service Water system (see Table 3.3.2-5, Valve Bodies, Copper Alloys (Zn<15%), Raw Water, Indoor – No Air Conditioning)(LRA page 3-246).
- Filter housings are in-scope, subject to aging management, and already included within the existing “Filters/Strainers” Component Type (see Table 3.3.2-9).
- Intake and exhaust structures/screens: PBNP’s exhaust screens/louvers have no license renewal intended functions and therefore, require no aging management. The outside air intake screen, however, will be included in-scope, subject to aging management, with potential aging effects of loss of material and fouling, both of which will be managed by the System Monitoring Program. NMC will add line items to Table 3.3.2-9 to address the aging effects associated with the ventilation air intakes during the License Renewal Application annual update. This addition is being tracked in the corrective action program.
- Duct sealants, wall sealants, and pressure boundary sealants are in-scope, subject to aging management, and already included in commodity fashion in the Civil/Structural portion of the LRA (see Tables 2.4.2 and 3.5.2-2, “Elastomers/Indoor-All” Component Type and Tables 2.4.11 and 3.5.2.11, “Silicone Based Material/Indoor” Component Type).

With regard to HX-190A/B and HX-191A/B, both of these heat exchangers were inadvertently shown to be in-scope on license renewal drawing LR-M-144, Sheet 2. These heat exchangers are part of the supplementary cooling for the computer room. They were installed specifically for the non-safety-related plant process computer. The heat exchanger cooling units are non-safety-related, and they do not affect the control room pressure boundary envelope. The loss of these cooling units will have no affect on any safety-related equipment, and therefore these units are out-of-scope of license renewal. License renewal drawing LR-M-144, Sheet 2, was revised and the error is being tracked in the corrective action program.