February 23, 2005

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 301-415-3703 or e-mail <u>VMR1@nrc.gov</u>.

Sincerely,

/RA/

Veronica M. Rodriguez, 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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Point Beach Nuclear Plant, Units 1 and 2

CC:

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James E. Knorr License Renewal Project Nuclear Management Company, LLC 6610 Nuclear Road Point Beach Nuclear Plant Two Rivers, WI 54241 DISTRIBUTION: Letter to : D. Koehl, Re: RAI for the review of the Pt. Beach Nuclear Plant, Units 1 and 2, Dated: February 23, 2005 Adams Accession No.: **ML050540542**

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

Bolting Integrity Program

RAI B.2.1.4-6

With respect to the discussion covering the structural bolting and fasteners under the "Detection of Aging Effects" program element, the applicant elected to take exceptions to the corresponding NUREG-1801 aging management program element and stated that, "Component that are within scope of license renewal and are not within the scope of the ASME Section XI ISI programs are visually inspected for signs of degradation and are only inspected more closely when signs of degradation are present." The applicant further indicated that, "PBNP does not plan to perform additional tests such as hammer tests, in situ ultrasonic tests, or proof tests by tension or torquing," without providing a plant specific basis for the exceptions taken. The staff requests the applicant to provide the following information:

- 1. In the context of PBNP's implementation of its aging management of in-scope structural bolting and fasteners explain, with examples, the definition or meaning of the phrase: "when signs of degradation are present."
- 2. List PBNP's basis for taking the above stated exceptions to the corresponding NUREG-1801 aging management program element, including a discussion of past plant-specific operating experience and/or inspection data based justifications.
- 3. Given a discovery or an identification of a credible or a significant degradation of in-scope structural bolting or fastener(s) meeting the definition of the item 1 above, please explain the specific steps that would be taken and a list of applicable plant specific program(s) or procedures that will be used, per the current PBNP's aging management program(s) for structural bolting and fasteners, to timely dispose the identified degraded event.

Spent Fuel Pool Storage Rack Boraflex

RAI B-2.1.5-1

Boraflex coupon inspections provide information regarding the extent of Boraflex panel degradation in the spent fuel racks. The LRA states that 10 full-length Boraflex panels are tested at 5-year intervals (four accelerated panels and six random panels). It is unclear if you intend to inspect Boraflex coupons in addition to inspecting the 10 full-length Boraflex panels. The staff requests the applicant to clarify this information.

RAI B-2.1.5-2

LRA Page B-61 states that the EPRI RACKLIFE predictive code or its equivalent is used to trend and analyze the results of the silica level measurements in the spent fuel pool (SFP). The staff requests the applicant to indicate what other "equivalent predictive codes" could be used. If these codes significantly differ from the EPRI RACKLIFE predictive code, please describe

these codes and discuss the significant differences. In addition, provide the criteria used for determining the frequency of silica level measurements in the SFP (*i.e.*, monthly, quarterly, or annually).

RAI B-2.1.5-3

The LRA indicates that enhancements to NUREG-1801 are to be completed prior to the extended operation period. These enhancements involve the creation of "new procedures" for Boraflex areal density testing, blackness testing, trending and analysis of silica sampling results, and determination of accelerated exposure panels. The staff requests the applicant to provide specific information regarding each of these enhancements.

RAI B-2.1.5-4

The Boraflex Monitoring Program at Point Beach performs the required scheduled surveillance program at a minimum frequency of 5-years. However, NUREG-1801 requires that "certain accelerated samples are tested every two years." The staff requests the applicant to justify this frequency difference and discuss any consequences of this less frequent surveillance program.