March 15, 2005

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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 February 23, 2005, the Nuclear Regulatory Commission (NRC) requested additional information regarding the Boraflex Monitoring Program (LRA Section B2.1.5) and the Bolting Integrity Program (LRA Section B2.1.4). The enclosure to this letter contains 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.

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 March 15, 2005.

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

Enclosure

A093

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.

Bolting Integrity Program

NRC Question 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, "Components 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.

NMC Response:

1. The PBNP Bolting Integrity Aging Management Program (AMP) credits the Structures Monitoring AMP and the ASME IWF AMP for the inspection of structural bolting. As described in LRA Section B 2.1.20 under "Parameters Monitored or Inspected," the types of degradation addressed by the visual inspection include corrosion, rust, looseness, physical damage or deformation, lack of full thread engagement, missing or out of place parts, and improper washers.

2. The NUREG-1801 Bolting Integrity Detection of Aging Effects discussion states that structural bolting is inspected by visual inspection, then goes on to say that degradation may be detected by non-visual methods such as proof tests by tension torquing, in-situ ultrasonic tests, hammer tests, or bolt removal. The use of these non-visual tests is not warranted or needed for detection of aging effects. NMC has conservatively characterized its Bolting Integrity AMP as taking an exception to NUREG-1801 in order to clarify that NMC is not intending to routinely perform these non-visual inspections. Visual inspection is considered adequate to detect the types of degradation described in item 1 above. These visual inspections apply to ASME (IWF) and non-ASME structural bolting.

   As discussed in the NMC clarification to RAI B.2.1.4-3 in NMC letter dated March 4, 2005, PBNP has not identified any high strength structural bolting susceptible to cracking. There have been no incidents of loss of intended function of a component or system due to structural bolting degradation.

3. The Structures Monitoring AMP requires that significant degradation of structural bolting will be documented and entered into the PBNP corrective action program. As part of the corrective action program process, degradation noted in these inspections will be evaluated, and appropriate actions relative to the significance of the degradation will be taken. Appropriate actions may include replacement and/or increased monitoring. The Aging Management Programs listed below are used to implement the Bolting Integrity Program.

   1. Periodic Surveillance and Preventive Maintenance Program
   2. System Monitoring Program
   3. Reactor Vessel Internals Program
   4. ASME Section XI, Subsections IWB, IWC & IWD Inservice Inspection Program
   5. Structures Monitoring Program
   6. ASME Section XI, Subsection IWF Inservice Inspection Program
   7. ASME Section XI, Subsections IWE & IWL Inservice Inspection Program

Spent Fuel Pool Storage Rack Boraflex

During a telephone conference call on March 2, 2005, the NRC staff and NMC discussed the following four questions regarding Spent Fuel Pool Storage Rack Boraflex in NRC letter dated February 23, 2005:

NRC Question 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.

NRC Question 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).

NRC Question 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.

NRC Question 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.

NMC Response:

The NRC staff requested that NMC not provide a response to these four RAIs at this time. The NRC staff indicated that they intend to provide further clarification and/or revise these RAIs in the future. They also indicated that these RAIs may be resolved by the Region III license renewal inspection being conducted at PBNP during March 2005.