

April 11, 2005

NRC 2005-0042
10 CFR 54

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

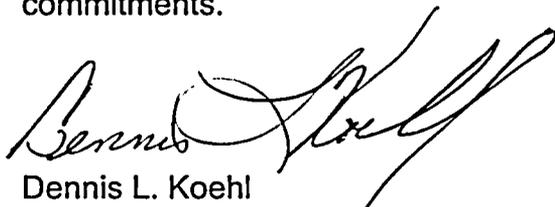
Point Beach Nuclear Plant, Units 1 and 2
Dockets 50-266 and 50-301
License Nos. DPR-24 and DPR-27

Comments on Draft NUREG-1437 Supplement 23
Regarding the Point Beach Nuclear Plant License Renewal Application
(TAC Nos. MC2049 and MC2050)

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 January 13, 2005, the Nuclear Regulatory Commission (NRC) published for comment NUREG-1437 Supplement 23, "Generic Environmental Impact Statement for License Renewal Of Nuclear Plants, Supplement 23, Regarding Point Beach Nuclear Plant Units 1 and 2." The enclosure to this letter contains NMC's comments on this Supplement.

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.



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

Enclosure

A093

Document Desk
Page 2

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

ENCLOSURE

COMMENTS ON DRAFT NUREG-1437 SUPPLEMENT 23 REGARDING POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 LICENSE RENEWAL APPLICATION

The following information is provided to comment on the draft NUREG-1437 Supplement 23 regarding the Point Beach Nuclear Plant (PBNP) License Renewal Application (LRA).

Specific Comments

Comment Number	Page	Reference Lines	Comment
1	xv	7-9	Sentence states that ".....NMC will ultimately decide whether the plant will continue to operate...." Remainder of sentence infers that NMC is the "owner". Consider clarifying this sentence to note that NMC submitted the renewal application on behalf of the owner, Wisconsin Electric Power Company (WEPCO). WEPCO will ultimately decide whether the plant will continue to operate.
2	xv	24 & 34	Wisconsin is misspelled. {Wiscsonsin}
3	xv	34	Public meetings were held in March 2005 and not February 2005.
4	1-1	20-22	This paragraph should identify that NMC operates Point Beach but the plant is owned by WEPCO.
5	1-7	17	Public meetings were held in March 2005 and not February 2005.
6	1-8	4	PBNP does not produce electricity for "250 million customers." WEPCO serves only about 1 million customers in total. On page 7-3 of our Environmental Report NMC states that PBNP provides about 25 % of the energy that WEPCO provides to its 1.08 million customers.
7	1-9	3-5	Sentence states that "NMC is required to hold certain Federal, State, and local environmental permits....." Sentence should read "NMC or Wisconsin Electric Power Company are required to hold certain Federal, State, and local environmental permits.....".
8	1-8	16-18	Another reference to the fact that the "owners" will ultimately decide whether the plant will continue to operate. Reinforces need to assure that the document identifies WEPCO as the owner.

Comment Number	Page	Reference Lines	Comment
9	1-7	36-39	This "design rating" discussion would be clearer if it were stated that the reactors were "originally" designed to produce a reactor thermal output of 1518.5 megawatts thermal. This is the language used on page 2-4 lines 9-12. Suggest that the language on page 1-7 be made consistent with that on page 2-4.
10	2-4	4	<i>"NMC has provided riprap to control further recession of the shoreline at the site."</i> WEPCO provided the Riprap and has the responsibility for controlling beach erosion at the plant.
11	2-16	19	<i>"To counter this erosion, NMC has placed riprap along the most sensitive stretches."</i> WEPCO provided the Riprap and has the responsibility for controlling beach erosion at the plant.
12	2-20	26	<i>"NMC has provided riprap to control further recession of the shoreline at the site."</i> WEPCO provided the Riprap and has the responsibility for controlling beach erosion at the plant.
13	2-19	6-7	This sentence does not seem to be factually correct. More than one tornado has caused major property damage in the state.
14	2-32	26	Consider deleting the word "annual." The monitoring program is essentially continuous.
15	2-33	21	Replace "WEPCO assessed doses" with "NMC assessed doses"
16	2-33	25	Consider replacing "boundary" with "site boundary"
17	2-38	32	The word "south" appears to be missing from the sentence. The state park is "south" of PBNP.
18	2-39	37-39	Sentence states that "The PBNP reactor containment structures are encased in vinyl coated steel buildings that are colored to blend with the green and brown Wisconsin countryside." This sentence is a slightly different characterization of a similar sentence on page 2-4 lines 28-29 which states "The containment structures are enclosed in vinyl coated steel buildings that are colored green and brown to blend in with the Wisconsin countryside." The sentence on page 2-39 is more accurate. Page 2-4 should be changed to be consistent with 2-39.

Comment Number	Page	Reference Lines	Comment
19	2-40	5-6	"reactor containment vessels" should be "reactor containment buildings"
20	2-52	25	Inconsistent use of the term "radiological surveillance program" On page 2-32, the term "radiological environmental monitoring program" is used.
21	2-5	Figure 2-3	The drawing has holes in the fence perimeter at the northeast corner of the switchyard and the southeast corner of the switchyard. Consider revising the drawing to assure fence perimeter accurately reflects current design.
22	2-5	Figure 2-3	The "Warehouse & Office" building (commonly referred to as the north gatehouse) has been demolished. Consider revising the drawing to depict that this building no longer exists.
23	2-11	20	Section 2.1.5, - Technically, the vacuum fabric filter system does not treat the sanitary waste. The on-site sewage treatment plant treats the sanitary waste such that the effluent is suitable for discharge without further filtration. Therefore, a more accurate statement would be, "A vacuum fabric filter system is now used for treating the wastewater."
24	2-11	23-31	Section 2.1.5, Recommend the revision of the statement that says PBNP is a large quantity generator. It should read that PBNP has historically and may in the future fluctuate between a small quantity and large quantity generator.
25	2-12	18-20	Sentence notes that NMC does not plan to add additional full-time staff at PBNP during the period of the renewed license. This is in conflict with a sentence on page 4-31, lines 25-26 which states that PBNP anticipates that no more than 2 new employees will be added during the license renewal term. Recommend that following statement is more correct: "NMC does not plan to add significant additional full-time staff at PBNP during the period of the renewed license."
26	2-18	6	Section 2.2.3, - The current WPDES permit was actually issued on July 1, 2004, not on July 7, 2004. The permit dates are mentioned in several other places throughout the report, but the 3 other places checked all had the correct date. It appears that just this one instance is incorrect.
27	2-20	9	Correct permit number is 436034500-P10

Comment Number	Page	Reference Lines	Comment
28	2-21	6-18	Per WDNR, Lake Michigan is not on the fish advisory due to mercury.
29	2-34	22	Add the word "nominal." Sentence should note that PBNP reactors are on a nominal 18-month refueling cycle.
30	4-13 and 4-16	26 and 40	Section 4.1.1, and Section 4.1.2, - The acoustic fish-deterrent system was installed in 2002, not 2003.
31	4-16	40	"... NMC installed a permanent fish deterrent system around the intake structures ..." WEPCO designed and installed the fish deterrent system under a compliance agreement with the U.S. Fish & Wildlife Service.
32	4-13 and 4-18	14 30-31	Section 4.1.1, and Section 4.1.2, - The proposal for the study that was due on December 31, 2004, was submitted to WDNR (transmittal letter dated 12/24/04)
33	4-36	7-8	There is no mention that the Wisconsin State Historical Society issued a Determination of Eligibility, State Historic Preservation Office that states that the Alois Biel Fishing Shed is not eligible for the National Register of Historic Places (WSHS letter dated Oct 21, 2004). The draft EIS states that NMC did not recommend the shed for inclusion - but it is the WSHS that makes the final determination.
34	8-49	31-33	NMC owns no generating assets. This paragraph should discuss WEPCO's plans for delayed retirement and not NMC's.
35	9-1	5-8	Sentence states that "...NMC will ultimately decide whether the plant will continue to operate.." Actually, WEPCO will decide if PBNP continues to operate. (See Comment #1 above regarding similar paragraph on Page xv) This summary section should clarify that WEPCO is owner and NMC is operator.
36	9-1	36	Public meetings were held in March 2005 and not February 2005.

NMC continues to believe that the SAMA 126 would not be cost beneficial. The benefit would be small (only reduce one of the current human error probabilities (HEPs), would incorporate new failure mechanisms) and the cost would be considerable (safety related modifications).

The HEP that the NRC recommends to reduce by implementing an automatic pump trip on low RWST level does not include the action to trip the pumps as a critical action because there is so much time available to complete it. (The first pump is tripped at 60% RWST level and additional actions to swap to containment sump recirculation are initiated at 34% RWST level.) There would, therefore, be no measurable benefit to implementing this modification at Point Beach to offset the cost. There is the potential of increasing the probability of a spurious pump trip from the additional low RWST level pump trip circuitry. This spurious pump trip would actually result in a slight risk increase if the modification were implemented.

Comment Number	Page	Reference Lines	Comment
37	5-5	23 - 28	SAMA 126 does not appear cost beneficial
38	5-9	17 - 28	SAMA 126 does not appear cost beneficial
39	G-16	11 - 19	SAMA 126 does not appear cost beneficial
40	G-29	25 - 31	SAMA 126 does not appear cost beneficial
41	G-31	15 - 16	SAMA 126 does not appear cost beneficial
42	G-32	8-13	SAMA 126 does not appear cost beneficial

External events are considered in this analysis by increasing the internal CDF by a factor of $(1 + CDF_{ext}/CDF_{int})$, NOT by a factor of 2.0. This is discussed in the Analysis File prepared documenting this study.

Comment Number	Page	Reference Lines	Comment
43	5-6,	5	Factor of $(1 + CDF_{ext}/CDF_{int})$ not 2.0
44	5-8	6	Factor of $(1 + CDF_{ext}/CDF_{int})$ not 2.0
45	G-27	Table Notes	Factor of $(1 + CDF_{ext}/CDF_{int})$ not 2.0
46	G-28	9	Factor of $(1 + CDF_{ext}/CDF_{int})$ not 2.0
47	G-31	31	Factor of $(1 + CDF_{ext}/CDF_{int})$ not 2.0
48	G-32	2	Factor of $(1 + CDF_{ext}/CDF_{int})$ not 2.0
49	5-6	14	Change % Contribution from "12.3" to "12.2".
50	5-7	16	Change % Contribution from "12.3" to "12.2".
51	G-3	15	Change population dose for "Other Core Melt Sequences" in Table 5-4 from " 1.04×10^{-2} " to " 1.04×10^{-1} ".
52	G-4	37	Change population dose for "Other Core Melt Sequences" in Table G-2 from "0.0104" to "0.104".
53	G-9	33	Change "containment ISLOCA" to "ISLOCA".
54	G-15	31-36	Paragraph is not correct. This seems to be a misinterpretation of response to RAI 10d. An accurate description of the RAI response is provided on Page G-28, lines 17-31.
55	G-31	27	Change "maximum allowable benefit" to "maximum attainable benefit".