

April 20, 2005

Mr. Dennis Koehl  
Site Vice President  
Point Beach Nuclear Plant  
Nuclear Management Company, LLC  
6610 Nuclear Road  
Two Rivers, WI 54241-9516

SUBJECT: POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING REVISION TO EMERGENCY  
ACTION LEVELS (TAC NOS. MC3773 AND MC3774)

Dear Mr. Koehl:

Your letter of October 15, 2004, submitted proposed, revised emergency plan and procedure changes to upgrade the Point Beach Nuclear Plant (PBNP) emergency action levels. The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing your submittal and finds that additional information is needed as shown in the enclosed request for additional information (RAI). I discussed this RAI with Mr. Aldo Capristo of your organization on April 7, 2005, and he agreed to respond by April 30, 2005.

Please note that these RAI questions have been developed specifically for PBNP. Therefore, these questions should not be considered as bounding for other Nuclear Management Company facilities. You can contact me at (301) 415-4018 if you have questions.

Sincerely,

**/RA/**

Harold K. Chernoff, Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure: As stated

cc w/encl: See next page

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**Point Beach Nuclear Plant (PBNP), Units 1 and 2**

**Revision to Emergency Action Levels (EALs)**

**Request for Additional Information**

**Docket Nos. 50-266 and 50-301**

Plant EAL #: RA 2.1 / Nuclear Energy Institute (NEI) EAL #: AA 2.1

State what alarm is going to be used for the EAL (high alarm, high-high, etc.), or state what reading will be used to trigger the initiating condition (IC).

Plant EAL #: RA 2.2 / NEI EAL #: AA 2.2

Is there specific analysis that supports the <10 ft. reference used in the EAL? Are the expected dose rates in line with other dose rate-based EALs (e.g., the analysis used in EAL RA 2.1)? In the basis document, it states that there is no instrumentation to read levels 10 ft. above fuel, so how would this be determined? Operator observation would not be able to tell if water is 10 ft. above fuel unless there is some reference scale available. So, please explain what is in place to provide a reference for operators.

Plant EAL #: CA 2.1 / NEI EAL #: CA 2.1

Does level indicator (LI) 447/447A continue to be functional in the refueling mode?

Plant EAL #: CA 4.3 / NEI EAL #: CA 4.3

Explain the scale graduation (minor and major) for pressure transmitter (PT) 420 and PT 493. Also, can pressure be read off of a PT? Should it be read of pressure indicators instead?

Plant EAL #: CG 1.1 / NEI EAL #: CG 1.1

EAL reference 2.a refers to 27-ft. reactor vessel level instrumentation system (RVLIS) or 0 percent LI-447/A, which represent different levels (EAL basis, 2nd paragraph; 0 percent = 33' 2 7/8"). Justification in the change documentation does not explain the rationale for using this parameter. A 10 rem/hr dose rate is used as part of this EAL. The justification does not adequately address the reason for the specific 10 rem/hr value.

Plant EAL #: CS 2.1 / NEI EAL #: CS 2.1

Explain the rationale for using 10 rem/hr as the trigger value for the high-range radiation monitor (HRRM) in this EAL.

Enclosure

Plant EAL #: CS 2.2 / NEI EAL #: CS 2.2

The deviation matrix documents the wrong wording for CS 2.1 as it is not the same wording as CS 2.2. Correct the PBNP EAL to address the correct NEI reference, or justify the rationale for using the 0 percent reactor-level indication for the top of active fuel reference for this EAL. In the basis document, it states that level indication may be unavailable and speaks specifically to RVLIS. The NEI reference to observable points is removed, and no mention of an observable indicator is included. Justify why Nuclear Management Company (NMC) did not follow NEI guidance for acceptable alternatives.

Plant EAL #: CU 5.1 / NEI EAL #: CU 5.1

NMC did not establish an EAL for fuel-clad degradation. The justification provided stated that no radiation monitors provide values in Modes 5 and 6. NMC identified RU 1.2, RU 2.1, and RU 2.2 as the mechanism for classification. Only RU 2.2 appears to possibly apply, but not specifically. This was noted as a deviation, but there is not enough justification for implementing it. Please provide more technical information to justify why this EAL cannot be addressed, provide a method(s) to determine and classify fuel degradation, or provide more substantial justification to validate that other EALs sufficiently address this event.

Plant EAL #: FB-PWR-CONT-PL3 / NEI EAL #: FB-PWR-CONT-PL3

The reference to 27-ft. RVLIS in this EAL does not appear to compare with the 25-ft. RVLIS level reference in FC potential loss #4. Review these level references and correct the applicable EAL reference, or justify the use of different levels.

Plant EAL #: FRONT SECTION / NEI EAL #: FRONT SECTION

NMC states how it will address non-EAL aspects of NEI 99-01, "Methodology for Development of Emergency Action Levels," such as event upgrades, downgrades, and transient events. However, specific changes to the Emergency Plan to incorporate these changes or documentation to state that the current Emergency Plan addresses the stated position was not found. Provide more explanation as to what changes to the Emergency Plan are being considered when implementing NEI 99-01, or justify why the current Emergency Plan does not require revision to implement NEI 99-01 non-EAL criteria.

Plant EAL #: GENERAL COMMENT / NEI EAL #: GENERAL COMMENT

In NMC's letter of March 31, 2005, it revised its commitment (ref: OP-14-005) to complete the revision/update of emergency operating procedure calculations by June 15, 2005. NMC needs to document which EALs are potentially impacted by this scheduled EOP calculation review. NMC also needs to evaluate the impact these revised/updated EOP calculations have on the proposed EALs, and provide technical justification for the review of these EALs before completing the calculation work.

Plant EAL #: HA 1.2 / NEI EAL #: HA 1.2

Please review the EALs and justify the difference in locations. Why do you specify "containment building" in EAL HU 2.1 and "reactor building" in this EAL?

Does your meteorological instrumentation read, and is it calibrated to read, 108 miles per hour? If not, describe the method(s) used to obtain information needed to classify this event.

Plant EAL #: HA 1.4 / NEI EAL #: HA 1.4

NMC's justification states that the ultimate heat sink would not be affected by a turbine failure, but the intake building (which is part of the ultimate heat sink) would be. Is the intake building the same as the circulating water pump house? Address and resolve discussions in the deviation/differences matrix and the basis document.

Plant EAL #: HA 1.6 / NEI EAL #: HA 1.6

Seiche is not addressed in this EAL. Correct this, or justify why it should not be included. Add, or justify why NMC did not address, low-water level references.

Plant EAL #: HA 2.1 / NEI EAL #: HA 2.1

Was an analysis performed to justify that the ultimate heat sink would not be affected (either from damage to structures or blockage from debris) from this type of event? Address apparent inconsistency with, or clarify, wording used in HA 1.4 regarding the ultimate heat sink.

Are all of the areas listed considered to be vital areas? Are there additional areas that should be considered under this EAL, such as the switch yard?

Plant EAL #: HA 3.2 / NEI EAL #: HA 3.2

Is there equipment in the intake building (or affecting the ultimate heat sink) that could be impacted by combustible gases?

Plant EAL #: HA 4.1 / NEI EAL #: HA 4.1

Is the switch yard in the protected area? If not, did NMC consider including the switch yard in this EAL. If it is included, there may be other EALs where the switch yard might also be included.

Plant EAL #: HA 4.2 / NEI EAL #: HA 4.2

Did NMC consider the switch yard in this EAL?

Plant EAL #: HS 1.1 / NEI EAL #: HS 1.1

Why was Table H-1 not included in this EAL?

Plant EAL #: HS 1.2 / NEI EAL #: HS 1.2

NMC needs to consider other security events. Is there a reason why Table H-1 was not included in this EAL?

Plant EAL #: HU 1 / NEI EAL #: HU 1

The IC was struck out of the page header.

Plant EAL #: HU 1.1 / NEI EAL #: HU 1.1

Define "activation" better. Also, can these monitors be monitored in the control room (CR) or do they have an annunciator? Do they require some sort of personnel action outside the CR (timeliness)? The discussion in the bases does not seem to agree with the deviation/differences matrix.

Plant EAL #: HU1.2 / NEI EAL #: HU1.2

Does your onsite meteorological instrumentation have the capability to read 108 mph and does it remain calibrated through its complete range?

Plant EAL #: HU 1.6 / NEI EAL #: HU 1.6

NMC indicated that only two locations referenced in this EAL are capable of flooding. Do these two areas cover all of the safety-related equipment?

Plant EAL #: HU 1.7 / NEI EAL #: HU 1.7

Seiche is not addressed in this EAL. This was not identified as a difference or deviation. Provide classification criteria for seiche, or identify this as a deviation and justify why seiche should not be considered for this EAL. Add low-water level references or justify why NMC did not address low-level situations.

Plant EAL #: HU 2.1 / NEI EAL #: HU 2.1

Table H-1 areas do not match with areas identified in HA 1.2. Review these EALs and justify the areas being different, or make all references the same.

Plant EAL #: SA 2.1 / NEI EAL #: SA 2.1

Please technically justify the 5-percent power criterion. Address meeting this EAL for Modes 2 and 3, or justify the reason for the deviation.

Plant EAL #: SA 5.1 / NEI EAL #: SA 5.1

Technically justify why using "busses" instead of "transformers" is appropriate for PBNP. This justification should include a discussion of the impact of this proposed difference on the declarations. Explain the affect on EALs of having one emergency diesel generator (EDG) supplying power to two units.

Plant EAL #: SG 2.1 / NEI EAL #: SG 2.1

Provide technical justification for the 5 percent power criterion.

Plant EAL #: SS 2.1 / NEI EAL #: SS 2.1

Please make sure that the Bases reflect that only actions taken from the reactor control console count; not actions taken anywhere else including the backpanels. Technically justify the 5-percent power criterion. Address meeting this EAL for Modes 2 and 3, or justify the reason for the deviation.

Plant EAL #: SU 1.1 / NEI EAL #: SU 1.1

Technically justify why using "busses" instead of "transformers" is appropriate for PBNP. This justification should include a discussion of the impact of this proposed difference on the declarations. Explain the affect on EALs of having one EDG supplying power to two units.

Point Beach Nuclear Plant, Units 1 and 2

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