

May 25, 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 - SECOND  
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 May 24, 2005, and he agreed to respond within 7 days of receipt of this letter.

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)**

**Second Request for Additional Information (RAI)**

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

1. Emergency Plan Implementing Procedure (EPIP) 1.2 Emergency Action Level (EAL) Technical Basis

It appears that there are at least several examples where the justification document, basis document, and EAL technical basis documents do not agree. Typically, wording is different where intent is generally the same, but there are several examples (such as EALs RA 2.2, CU 5.1, HU 1.1, HA 1, HA 2, HA 3, and HS 1, but this list may not be inclusive) where additional and useful basis information is missing from at least one of the documents. Specifically, additional information, included in the justification document, is not included in the technical basis document that is the reference used by the emergency coordinator for classifying events. Review EPIP 1.2 EAL Technical Basis, and appropriately insert information from other documents which will aid the emergency coordinator to correctly and consistently classify emergencies.

2. EAL RA2.2

Determination of a means to visually estimate "10 feet above radiated fuel assembly(s) " is missing from the EPIP 1.2 EAL Technical Basis, and is inconsistently developed in the justification and technical basis documents. For this to be an EAL reference, a determinable method to classify should be in place. While it appears that PBNP has a methodology using the plate weld joints along the wall of the spent fuel pool, this was not descriptively used in the basis document as a defined method. Additionally, the basis section of the justification document alters the classification criteria (3<sup>rd</sup> bullet lists 4 new conditions). These do not appear in the basis document or the technical basis. The technical basis (which appears to be the document that will be used for classification) does not discuss the use of the weld joints or the spacing between the joints (which would appear to provide information to estimate depth). Provide a descriptive means to determine this EAL in EPIP 1.2, and correct all documents so that the chosen method is appropriately documented and justified.

3. HU 1.1

Reference to seismic monitors in HU1.1 is such that it appears to require "activation" of both of the plant monitors (two or more) AND be verified to declare event. According to Nuclear Management Company's (NMC's) RAI response of April 30, 2005, there are only two seismic monitors so the "2 or more" reference does not appear to be correct. There is a difference in the monitor alarm requirements between HU 1.1 and HA 1.1, with HA 1.1 appearing to be the appropriate alarm reference. Correct EAL HU 1.1 to be consistent with the HA 1.1 monitor response.

Enclosure

4. HU 2.1, HA 1.2, HA 1.3, HA 1.4, HA2.1, HA 3.1, HA 3.2, HS 1.1

Table H-1 is titled "VITAL AREAS" but the 1<sup>st</sup> bullet in the justification says that Table H-1 areas are either vital areas, contain vital areas, or are contiguous to vital areas. This is confusing and appears that it could result in classification errors in other EALs. For instance, EAL HU 2.1 references Table H-1 and directs classification in areas contiguous to areas contiguous to vital areas (if the explanation of the table in HA 2.1 is correct.) HA 1.4 may also not be correct if Table H-1 is a list of areas contiguous to a vital area. The basis reference for HA 1.4 discusses "plant structures/equipment list (Table H-1) CONTAINING functions required for safe shutdown." In HS 1.1, the term VITAL AREA is included in the EAL but Table H-1 is not. In this EAL, it appears that the areas listed in Table H-1 would not be appropriate for classification. However, using the same terminology (VITAL AREA) as a catch-all for areas contiguous to vital areas and a strict definition of vital area (without the table reference) being used in a different context for EAL HS 1.1 could be confusing. The definition of VITAL AREAS used by PBNP does not match the Table H-1 VITAL AREAS. Correct the title of Table H-1 to eliminate this potential confusion and to clearly define the areas listed in that table. Review those EALs which include Table H-1 and EALs which use the words "VITAL AREAS" to ensure that the areas listed meet the intent of each EAL.

5. CU 3.1, CA3.1, SU1.1 SA 5.1, and SS1.1

Specific to the use of buses vice transformers as the applicable piece of powered equipment, it appears that there are scenarios where differences in classification could occur, and accordingly, the characterization of the change from Nuclear Energy Institute (NEI) 99-01, "Methodology for Development of Emergency Action Levels," should be a "deviation." In the previous RAIs, PBNP was asked to "include a discussion of the impact of this proposed difference on the declarations" which was not provided for SA 5.1. It is important that the staff understand the potential ramifications of approving the use of buses in the EALs. Taking the proposed EALs and using the bus logic versus the transformer logic used in NEI 99-01, provides a comparison of PBNP classifications and how they would deviate from classifications made specifically using NEI 99-01 EALs. From an NMC perspective, and with regard to the consistency of event scenarios and classifications at other nuclear sites in the State of Wisconsin, explain any differences in approach and any confusion or impact that State or local emergency management officials might have with inconsistent classifications of similar events.

6. Emergency Operating Procedure (EOP) Calculation Review

An RAI was issued to the PBNP to document which EALs were impacted by the commitment made (OP-14-005) to review and revise EOP calculations, as necessary. In NMC's April 30, 2005, RAI response, PBNP listed 15 EALs which could be impacted. NMC stated that determination of setpoint value applicability and integration into EAL values will be in accordance with the review process per Title 10 of the *Code of Federal Regulations* Section 50.54(q). PBNP also stated that any changes determined to be a decrease in effectiveness will be submitted to NRC for prior approval. Insufficient information was provided for the staff to evaluate the potential impact of operational parameter setpoint changes of the referenced EALs. Provide a detailed justification for each EAL sufficient to allow the staff to evaluate the impact of potential changes to applicable setpoints and determine whether it is appropriate to approve the proposed EALs even though the setpoint values may not be correct.

Point Beach Nuclear Plant, Units 1 and 2

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