

June 29, 2005

NRC 2005-0082  
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

Clarification to 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 May 2, 2005, the Nuclear Regulatory Commission (NRC) provided a draft Safety Evaluation Report (SER) with open items and confirmatory items. NMC letter to the NRC dated June 10, 2005, provided comments on the SER and provided additional information concerning the Open Items and Confirmatory Items. The Nuclear Regulatory Commission (NRC) staff has requested clarification of information regarding the response to Confirmatory Item, CI 2.4-2, concerning Tank Foundations.

The NMC letter to NRC dated June 10, 2005, provided a list of in-scope tanks whose foundations are also age-managed. The criteria for considering a tank in-scope is provided in LRA Section 2.1. It can be summarized that the methodology used to scope the mechanical and structural component parts of a tank installation with its associated foundation is in accordance with the requirements of the 10 CFR 54.4(a) scoping criteria. Therefore, if the tank is safety-related (10 CFR 54.4(a)(1)), non-safety related affecting safety-related SSCs (10 CFR 54.4(a)(2)), or required to meet the regulated event criteria in accordance with 10 CFR 54.4(a)(3), the tank and its associated foundation would be considered in-scope for license renewal. If the tank and its associated foundation do not meet the criteria in 10 CFR 54.4 as summarized above, the tank and its foundation would be considered out-of-scope. Finally, in order to be subject to an Aging Management Review the tank and its associated foundation must be considered in-scope, passive, not subject to periodic replacement, and must have a component intended function.

In-scope tanks subject to an Aging Management Review are listed in LRA Section 2.3 as mechanical components with the intended function of pressure boundary. The Aging Management Review results are listed in the tables for Sections 3.1 through 3.5.

Tank foundations are scoped in LRA Section 2.4 with the individual buildings and are typically constructed of concrete or steel. Tank foundation Aging Management Review results information is contained within the corresponding Section 3.5 of the LRA. As an example, the Control Building houses and supports the Condensate Storage Tanks. The tanks are supported by concrete foundations. The line item for the tank's concrete foundations can be found in Table 3.5.2-2, page 3-441, line item 2. The table component type is "Concrete/Indoor-All: Walls, ceilings, floors, columns; Equipment pedestals; Spray walls (AFWP Rm)" and the intended function is "Support NSR" (Non-Safety Related) and/or "Support SR" (Safety Related). Each in-scope concrete tank foundation in the Control Building would be captured by this line item.

The Diesel Generator Day Tank is an example of a steel tank foundation in the Control Building. The line item for the tank's steel foundation can be found in Table 3.5.2-2, page 3-445. The table component type is "Structural Carbon Steel/Indoor -All: HELB barriers – Cable Spreading Rm (CSR) north and south wall, Non-VSR - South wall and braces, and east wall barriers around cable trays; SW guard pipe - Battery Rm; CST supply guard pipe - 1E Battery Rm (26 EL); Door braces - VSR south and west walls; Wall plates - CSR north and south walls; Wall panels - CR north, south and east walls; Flood barrier - Non-VSR (east wall); Masonry wall bracing; Platforms, stairs" and the intended function is "Support SR." Every in-scope steel tank foundation in the Control Building would be captured by this line item.

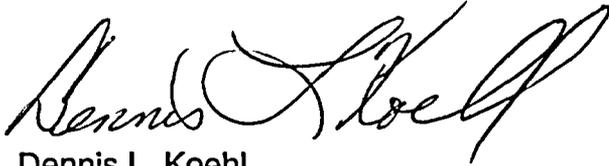
The same methodology is used for the remaining buildings within the scope of license renewal. The section for Yard Structures is somewhat unique because of the nature of the structures within the yard area. For this section the capture of tank foundations was more explicit due to the fact the yard has no "buildings." Table 3.5.2-8, "Yard Structures," page 3-460, line items 1 and 3, concrete tank foundations component type is "Concrete/Buried - All: Electrical Duct Banks; Equipment foundations and support pads; Manholes," and "Concrete/Outdoor - All: Equipment foundations and support pads; Manholes and covers," and the intended functions for each are "Support SR" and "Support NSR." Each in-scope concrete tank foundation in the Yard Structures would be captured by these line items.

Should you have any questions concerning this submittal, please contact Mr. James E. Knorr at (920) 755-6863.

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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  
June 29, 2005.

A handwritten signature in black ink, appearing to read "Dennis L. Koehl". The signature is fluid and cursive, with the first name "Dennis" being the most prominent.

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

Enclosure

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