

August 23, 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

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 May 2, 2005, the Nuclear Regulatory Commission (NRC) provided a draft Safety Evaluation Report (SER) for the PBNP LRA. By letter dated June 10, 2005, NMC provided comments on the NRC draft SER. Included in that draft SER were the following commitment and implementation text:

1. Commitment number 3 of draft SER Appendix A, "Chemical Analysis of the soil, groundwater, and lake water will be performed to ensure the below grade environment remains non-aggressive."
2. Implementation schedule text for commitment number 23 of draft SER Appendix A, "In the Case of Sprinkler Heads, Inspection Prior to Exceeding 50-Year Schedule Life."

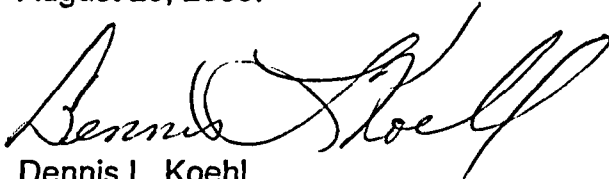
On August 10, 2005, a teleconference was held between NMC and the NRC staff to discuss these comments. During the teleconference, information was identified that should be included in formal correspondence. Enclosure 1 to this letter provides that information.

This letter contains the following deletions and revisions to existing commitments:

1. Delete commitment number 3 on page A-2 of Appendix A in the draft SER.
2. Revise the implementation schedule for commitment number 23 on page A-5 of Appendix A in the draft SER.

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

I declare under penalty of perjury that the forgoing is true and correct. Executed on  
August 23, 2005.



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

## ENCLOSURE 1

### ADDITIONAL INFORMATION REGARDING POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 LICENSE RENEWAL APPLICATION

The following information is provided as a result of a teleconference between the Nuclear Regulatory Commission (NRC) staff and Nuclear Management Company, LLC (NMC), regarding the draft Safety Evaluation Report (SER) for the Point Beach Nuclear Plant (PBNP) License Renewal Application (LRA).

#### 1. Delete Commitment Number 3:

On page A-2 of Appendix A in the draft SER for the PBNP LRA, commitment number 3 states, "Chemical analyses of the soil, groundwater, and lake water will be performed to ensure the below-grade environment remains chemically non-aggressive." The Implementation Schedule for this commitment is "Prior to Period of Extended Operation." This commitment is already encompassed by commitment number 33 on page A-6 of Appendix A in the draft SER, which states "Implement an enhanced Structures Monitoring Program." The Implementation Schedule for the enhanced Structures Monitoring Program is also "Prior to Period of Extended Operation." Therefore, commitment number 3 on page A-2 of Appendix A in the draft SER should be deleted.

#### 2. Validation of Environmentally Assisted Fatigue Cumulative Usage Factor:

During the teleconference between the NRC staff and NMC on August 10, 2005, validation of the environmentally assisted fatigue cumulative usage factor ( $CUF_{EAF}$ ) value for the instrument nozzle stainless steel tube penetrating the wall of the pressurizer was requested.

The  $CUF_{EAF}$  value of 0.6293 appears on page 4-64 of the PBNP LRA and should be inserted into Section 4.3.10.1 of the draft SER on page 4-35, paragraph 6 in place of the  $CUF_{EAF}$  value of 0.6035. This number has been verified by consulting the Westinghouse Point Beach Pressurizer Environmental Fatigue Evaluation (WEP-03-92) dated July 28, 2003.

### **3. LRA Section 15.4 - EVALUATION OF TIME-LIMITED AGING ANALYSES:**

#### **Background**

As a result of the teleconference on August 10, 2005, a short description of an additional TLAA regarding the Reactor Vessel Head Penetration Analysis is provided for inclusion into the LRA FSAR Supplement. NMC has identified that the following additional sub-section should be added to LRA Appendix A, Section 15.4.3, "Fracture Mechanics Analysis."

#### **Description of Changes to License Renewal Application**

Add a new subsection to LRA Appendix A, Section 15.4.3, "Fracture Mechanics Analysis," on LRA page A-47 following the last paragraph of Section 15.4.3 as follows:

##### **"Reactor Vessel Head Penetration Analysis**

Additional structural, fatigue, corrosion, and fracture mechanics analyses have been performed in support of inspections of both Unit 1 and Unit 2 PBNP reactor pressure vessel (RPV) head Alloy 600 penetrations, and inspection and repair of the Unit 1 PBNP reactor pressure vessel head penetration 26. In general, the analyses do not support operation with the existing RPV heads to end of extended life (EOEL) due to the Alloy 600 penetrations. The analyses provide justification for operation through each Unit's current fuel cycle. The RPV head on each unit will be replaced with a new RPV head that does not incorporate Alloy 600 penetration material. The RPV heads will be replaced in each unit's respective refueling outage in 2005. All analyses associated with the new RPV heads have been evaluated for operation through EOEL in accordance with 10 CFR 54.21(c)(1)(i)."

### **4. Commitment Implementation Schedule Text Revision:**

On Page A-5 of Appendix A in the draft SER for the PBNP LRA, the Implementation Schedule for Commitment Number 23 states "In the Case of Sprinkler Heads, Inspection Prior to Exceeding 50-Year Service Life." This requirement is already encompassed by Commitment Number 23, which states "Implement an enhanced Fire Protection Program." The Implementation Schedule for the enhanced Fire Protection Program is "Prior to Period of Extended Operation," which is prior to the sprinkler heads exceeding their 50-year service life. Therefore, the Implementation Schedule for Commitment Number 23 on Page A-5 of Appendix A in the draft SER should be revised by deletion of the following text: "In the Case of Sprinkler Heads, Inspection Prior to Exceeding 50-Year Service Life."