April 18, 2008

Mr. James McCarthy
Site Vice President
FPLE Point Beach
6610 Nuclear Road
Two Rivers, WI 54241-9516

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION RELATED TO TECHNICAL SPECIFICATION 3.7.5 C COMPLETION TIME EXTENSION FOR POINT BEACH, UNITS 1 AND 2 (MD7672 AND MD7673)

Dear Mr. McCarthy:

The purpose of this letter is two-fold, (1) to request additional information so that the staff can complete its review and (2) to request your assistance relating to planning of your future licensing requests submitted to the Nuclear Regulatory Commission (NRC).

FPL Energy Point Beach, LLC (FPLE-PB), submitted a license amendment request dated December 31, 2007, to revise Point Beach Nuclear Plant, Units 1 and 2, Technical Specification (TS) for the completion time (CT) of TS 3.7.5.C. This revision would allow two separate one-time extensions of the CT for TS 3.7.5.C from seven days to 16 days; one extension for each of the train-specific motor-driven auxiliary feedwater pumps.

FPLE-PB requested a completion date by August 1, 2008. This requested completion date allows approximately 7 months for us to complete our review. The NRC has established performance goals for licensing actions to complete 96 percent in less than 1 year and 100 percent in less than 2 years. Consistent with these performance goals, we will endeavor to complete our review of your December 31, 2007, license amendment request as expeditiously as possible. However, based on the technical issues that need to be resolved, we may not complete our review by August 1, 2008.

We request your assistance to ensure that your licensing requests are well planned, taking into consideration your needs as well as the NRC's performance goals.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on April 3, 2008, it was agreed that you would provide a response within 30 days of receipt of the request for additional information (RAI). The enclosed RAI is only from the balance of plant branch. Additional RAIs are being developed in the fire protection and risk assessment areas and will be transmitted to you at a later date.

The NRC staff considers that timely responses to RAIs will help ensure sufficient time is available for staff review. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1424.

Sincerely,

/RA/

Jack Cushing, Senior Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure:
Request for Additional Information

cc w/encl: See next page

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Docket No. 50-266 and 50-301

Enclosure:
Request for Additional Information

cc w/encl: See next page

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Point Beach Nuclear Plant, Units 1 and 2

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REQUEST FOR ADDITIONAL INFORMATION (RAI)

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

TECHNICAL SPECIFICATION 3.7.5 C COMPLETION TIME EXTENSION

DOCKET NOS. 50-266 AND 50-301

In reviewing the FPLE Point Beach, LLC's submittal dated December 31, 2007, the Nuclear Regulatory Commission staff has determined that the following information is needed in order to complete its review:

Balance of Plant RAIs

RAI 1

On page 1 of Enclosure 1, List of Regulatory Commitments, and on page 11 of Enclosure 2, as part of Tier 2 - Avoidance of Risk Significant Plant Configurations - the licensee states no other work that impacts risk will be planned to take place concurrently. As a result, the licensee takes credit for zero-maintenance term in probabilistic risk assessment.

Verify that the licensee can operate the two plants for both 16 day periods, without having to perform any surveillances or maintenance that would impact risk.

RAI 2

On page 23 of Enclosure 2, the licensee states that there were seven fire areas where a fire concurrent with a motor driven auxiliary feedwater (MDAFW) pump being unavailable because of the extended replacement activities could result in no auxiliary feedwater (AFW) pump being available to provide decay heat removal.

Explain the basis for the above statement that no AFW would be available if there was a fire in any of these areas.

RAI 3

On page 1 of Enclosure 1, List of Regulatory Commitments, and on page 12 of Enclosure 2, as part of Tier 2 - Avoidance of Risk Significant Plant Configurations - the licensee states that redundant operable AFW trains and supporting systems will be protected from inadvertent challenges. This design modification may involve interfaces with electrical busses/logics that supply power/start signals to the other operable AFW trains, which would present inadvertent challenges to these protected trains. Regulatory Guide 1.174 directs the licensee to perform a safety margin assessment. Potential interfaces include:

a) Both the MDAFW pumps and turbine driven auxiliary feedwater (TDAFW) pumps start on a trip or shutdown of both main feedwater pumps or closure of both feedwater regulating valves in one unit. These signals are processed through AMSAC at power levels above 40 percent.

b) The Updated Final Safety Analysis Report (UFSAR) shows safe shutdown loads for 125v DC comes from two busses, D-03 and D-04.
The steam supply and AFW discharge valves for the TDAFW pumps are powered from vital 125V DC.

c) This change will result in an increase in the emergency diesel generator loading, that the licensee states has been factored in the station electrical analysis, and has been deemed acceptable. Though the design considers the impact on the bus and diesel, the implementation of this modification from the 480v AC bus to the 4160v AC bus may affect sequencing and logic of risk important equipment.

1) Describe the interfaces this modification may have with other risk important equipment during the modification and testing that may affect operability of the other AFW pumps if an inadvertent action occurred.

2) Identify actions that will be used to fulfill licensing commitment to protect redundant operable trains from these inadvertent challenges.

3) Identify how the safety margins were affected and methodology used to determine the new margins were acceptable.

RAI 4

The UFSAR states that the AFW system components are tested and inspected in accordance with technical specification surveillance criteria and frequencies. Testing verifies motor-driven pump operability, turbine-driven pump operability including a cold start, and operability of all required motor operated valves (MOV). Control circuits, starting logic, and indicators are verified operable by their respective functional test. New pumps and flow control valves will change flow rates, or may require changes to flow orifices to limit flow to ruptured generator with a MOV open.

Verify that all required post modification testing can be performed with the units at the proposed power level and would not present an inadvertent challenge to other protected trains.

RAI 5

In the event of a loss of the TDAFW pump during an accident involving a steam generator tube rupture (SGTR) main feedwater line break in containment, or faulted steam generator (main steam line break (MSLB)), there may only be AFW to the faulted generator. In the UFSAR design basis, AFW is to be capable of isolating steam and feedwater to the faulted steam generator following a SGTR or a MSLB.

On page 18 of Enclosure 2, the licensee states “If one of the unit-specific TDAFW pumps fails, then the remaining unit-specific TDAFW pump system is capable of providing 200 gallons per minute (gpm) per steam generator to a single unit, and the remaining in-service MDAFW pump system is capable of providing the credited 200 gpm to a single steam generator on the other unit.” However, the methodology does not appear to address if the faulted generator or tube rupture occurs on the only steam generator supplied by the MDAFW pump, assuming the TDAFW pumps fails.

In addition, on page 20 of Enclosure 2, Section 3.2.1.3 - Isolation of Ruptured or Faulted Steam Generator - the deterministic evaluation analysis does not address the ability to isolate feed to a steam generator if the faulted generator or tube rupture occurs on the only steam generator supplied by the MDAFW pump, assuming failure of the TDAFW pump.

Provide an analysis of the response of the plant to meet design criteria to isolate flow to a ruptured or faulted steam generator during this maintenance activity.

Further on page 3 of Enclosure 2, the licensee states that during this modification, the cross connect capability for the MDAFW pumps to feed the other steam generator will not be available.

Explain how the unavailability of the cross tie valves affects the ability to meet: the current design basis, functions credited in risk assessment, and fulfill the defense in depth for accident analysis.

RAI 6

On page 19 of Enclosure 2, the licensee states that upon a SGTR the required flow rate will be 270 gpm to provide a rapid cooldown to meet design basis requirement. The SGTR and MSLB events require a rapid cool down in addition to meeting the demands of decay heat removal. However, the licensee reports that the margin available with a single MDAFW pump is minimal. Based upon the steam generator level, reactor coolant system temperature and pressurizer level that accompany the loss of normal feed and loss of all AC power to the station auxiliaries analyses, additional pumping capacity would be required to mitigate the SGTR or MSLB events. The existing MDAFW pump can only deliver 200 gpm and the proposed new pump only delivers 240 gpm, which is still less than the 270 gpm required for SGTR and MSLB.

The licensee states that the purpose for this design change and approval for an extended technical specification completion time (CT) was to modify the AFW pump system to alleviate the portions of the existing operable but nonconforming or degraded conditions; however, this modification does not meet the design flow requirements for SGTR and MSLB. Explain why the modification was not designed to alleviate this condition, and how will the licensee address this continuing degraded condition.