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Regional Administrator Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352

Point Beach Nuclear Plant Units 1 and 2 Docket Nos. 50-266 and 50-301 Renewed License Nos. DPR-24 and DPR-27

Reactor Vessel Internals Program Regulatory Commitment Change

## References: (1) Nuclear Management Company, LLC letter to NRC dated July 12, 2004, License Renewal Application Clarifications (ML041960159)

(2) NUREG-1839, Safety Evaluation Report Related to the License Renewal of Point Beach Nuclear Plant, Units 1 and 2, dated December 2005 (ML053420129)

As part of the Point Beach Nuclear Plant (PBNP) license renewal application, (Reference 1), a commitment was made related to the PBNP Internals Aging Management Program. The commitment includes a plan to develop an aging management program for the reactor internals that would be based on the industry Electric Power Research Institute Material Reliability Program (EPRI/MRP) efforts to provide a standardized pressurized water reactor (PWR) inspection guideline for reactor internals.

Nuclear Management Company, LLC (NMC) committed to submitting a Reactor Vessel Internals Program to the NRC for review and approval two years prior to entering into the period of extended operation. The EPRI/MRP program is intended to provide an industry-wide, consistent approach that would be based on the most recent industry research and modeling techniques associated with the behavior of the internals materials following exposure to the neutron fields associated with the reactor core.

A standard approach on the internals program will eliminate duplication and inefficiencies of each plant taking a different approach in determining the most severe or limiting degradation conditions for each component. It is also intended to reduce the amount of review time required by the NRC if all PWRs follow a standard inspection and evaluation guideline.

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The EPRI/MRP draft of the PWR industry internals aging management guideline was issued in July 2008. The EPRI/MRP document is scheduled to be submitted to the NRC for review in December 2008. Accordingly, FPL Energy Point Beach will submit the Reactor Vessel Internals Aging Management Program to the NRC one year prior to commencement of renewed operation.

## Summary of Regulatory Commitments

The existing commitment states, "A Reactor Vessel Internals Program will be submitted to the NRC for review and approval two years prior to entering into the period of extended operation." The proposed commitment change states, "FPL Energy Point Beach will submit the Reactor Vessel Internals Aging Management Program to the NRC for review one year prior to commencement of renewed operation."

Very truly yours,

FPL Energy Point Beach, LLC

Larry Meyer Site Vice President

cc: Document Control Desk Project Manager, Point Beach Nuclear Plant, USNRC Resident Inspector, Point Beach Nuclear Plant, USNRC