



FPL Energy

Point Beach Nuclear Plant

February 11, 2009

NRC 2009-0015

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Point Beach Nuclear Plant, Unit 1
Docket 50-266
Renewed License No. DPR-24

Point Beach Nuclear Plant, Unit 1,
Nine-Month Supplemental (Post-Outage)
Response to NRC Generic Letter 2008-01

- References:
- (1) NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008 (ML072910759)
 - (2) FPL Energy Point Beach Letter NRC 2008-0019, Three-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated May 12, 2008 (ML081340756)
 - (3) NRC Letter to FPL Energy Point Beach, "Point Beach Nuclear Plant, Units 1 and 2 Re: Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," Proposed Alternative Course of Action," dated September 25, 2008 (ML081360263)
 - (4) FPL Energy Point Beach Letter NRC 2008-0075, Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated October 14, 2008 (ML082880659)

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01 (Reference 1) to request that each licensee evaluate the licensing basis, design, testing, and corrective action program (CAP) action requests (ARs) for the emergency core cooling systems (ECCS), shutdown cooling (RHR) system, and containment spray (CS) system, to ensure that gas accumulation is maintained less than the void volume that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

By letter dated May 12, 2008 (Reference 2), FPL Energy Point Beach submitted a Three-Month Response to GL 2008-01 for Point Beach Nuclear Plant, Unit 1. The NRC Staff's assessment of the response for Point Beach Unit 1 is contained in Reference (3).

As requested in Reference 3, please find the enclosed FPL Energy Point Beach supplemental response to the Nine-Month Response letter (Reference 4). This supplemental response is being submitted within 90 days of startup from the Unit 1 fall 2008 outage in which the deferred

actions were completed. GL response activities that remain to be accomplished, such as the long-term items identified in Reference 4, are considered to be confirmatory.

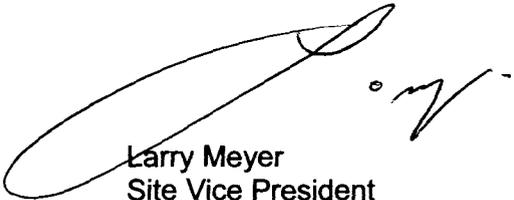
In summary, FPL Energy Point Beach has concluded that the subject systems and functions at Point Beach Unit 1 are operable and that they are currently in compliance with the licensing basis documentation and applicable regulations, including 10 CFR 50 Appendix B, Criterion III, V, XI, XVI, and XVII, with respect to the concerns outlined in GL 2008-01.

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing and enclosed information is true and correct. Executed on February 11, 2009.

Very truly yours,

FPL ENERGY POINT BEACH, LLC



Larry Meyer
Site Vice President

Enclosure

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

ENCLOSURE

FPL ENERGY POINT BEACH, LLC POINT BEACH NUCLEAR PLANT UNIT 1

Nine-Month Supplemental (Post-Outage) Response to NRC Generic Letter 2008-01

As requested by the NRC in Reference 3 of the cover letter, this enclosure provides the Nine-Month Supplemental (Post-Outage) Response to NRC Generic Letter 2008-01 for actions that were deferred until the next refueling outage.

The following information is provided in this enclosure:

- a) A description of the results of evaluations that were performed pursuant to Generic Letter 2008-01 on the previously incomplete activities, such as system piping walkdowns and ultrasonic testing at Point Beach Nuclear Plant Unit 1 (See Section A of this enclosure).
- b) A description of any additional commitments and corrective actions determined necessary to assure system operability and compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license with respect to the subject systems, including a schedule and a basis for that schedule (See Section B.1 of this enclosure).
- c) A summary of any changes or updates to previous commitments and corrective actions, including any schedule changes and the basis for the change (See Section B.2 of this enclosure).

The original conclusions documented in the Nine-Month Response with respect to the licensing basis evaluation, testing evaluations and corrective action evaluations have not changed.

A. PBNP UNIT 1 EVALUATION RESULTS

1. Design Basis Documents

Changes to Unit 1 design basis documentation were required as part of the modification process to incorporate two vent valves that were installed during the fall 2008 refueling outage. The location of these valves is discussed below in Section A.3.

Calculations and analyses have been prepared to determine the potential void volumes in unvented high points, and to establish the acceptance criteria for gas accumulation in the suction and discharge piping of the Unit 1 safety injection (SI) system, the residual heat removal (RHR) system and the containment spray (CS) system. These calculations and current revisions are identified below:

Table 1: GL 2008-01 PBNP Specific Analyses

PBNP-994-40-M01, Rev. 1	ECCS Discharge Piping Gas Void Calculation and Operability Determination
PBNP-994-40-M02, Rev. 2	ECCS Suction Piping Gas Void Calculation and Operability Determination

The current results of these analyses are reported in Section A.2 below.

2. Confirmatory Walkdowns

a. Overview

System walkdowns were performed on accessible and inaccessible areas of the SI, RHR and CS systems, both prior to and during the PBNP Unit 1 fall 2008 refueling outage. A combination of drawing reviews, laser scanning, manual slope measurements and analyses were used to identify high points where gas could accumulate and challenge system function. Unvented high point locations were evaluated to determine if the maximum gas volume that could be present in that location exceeded pre-established screening criteria. The unvented high points with maximum gas volumes that exceeded the screening criteria were subjected to ultrasonic testing (UT) examination to determine the size of voids, if any, present in these areas.

In addition to the UT examinations performed for the initial screening of unvented high points, 11 post-maintenance/post-modification UT examinations were performed. These examinations focused on locations where the system piping had been drained for maintenance, and were performed to verify that the affected systems were sufficiently full of water before being returned to service.

The results of the UT examinations were entered into the corrective action program to ensure that appropriate corrective actions were established for any detected gas voids.

b. Acceptance Criteria

Gas voids that were found to be less than the acceptance criteria as previously provided in Reference 4 were considered to be acceptable without further evaluation. Gas voids that were found to be greater than the acceptance criteria required further evaluation to determine if system operability was a concern.

i. Pump Suction Piping

The interim acceptance criteria for gas accumulation in the pump suction piping are based on limiting the gas entrainment after a

pump start. A Pressurized Water Reactor Owners Group (PWROG) program has established interim pump gas ingestion limits that may be employed by member utilities. These limits have been used to establish the acceptance criteria for the SI, RHR and CS pumps at PBNP, and have not changed from those presented in the Nine-Month Response (Reference 4).

A plant-specific evaluation was performed for use in operability determinations to define acceptance criteria for gas voids in the suction piping of the GL 2008-01 systems based upon the above pump gas ingestion limits. These criteria apply to the entire system and, as such, are conservative. A summary of pump suction void size acceptance criteria is given below:

Table 2: Allowable Initial Void Volume - Suction Piping

System	Location	Acceptable Void Size
RH	Pump Suction Piping >18 ft Above the Pump	0.300 ft ³
RH	Pump Suction Piping <18 ft Above the Pump	0.087 ft ³
RH	RH Hot Leg Suction Piping at Standby Conditions	1.421 ft ³
CS/SI	All CS/SI Pump Suction Piping Excluding Piggyback Piping	0.039 ft ³
CS/SI	Piggyback Piping from RHR Discharge	0.103 ft ³

Some of the pump suction void size acceptance criteria have been revised from that which was originally communicated in the Nine-Month Response (Reference 4). The revised acceptance criteria is more conservative than the original acceptance criteria and is based on the use of more conservative assumptions when applying the industry guidance for assessing the transport of gas to the suction of the Emergency Core Cooling System (ECCS) pumps. Unvented high points that were previously excluded from requiring a UT examination based on the original criteria were reevaluated using the revised criteria. Use of the revised acceptance criteria did not result in any additional UT examinations of unvented high points.

ii. Pump Discharge Piping

For the discharge piping, the acceptance criteria were based on limiting the void size such that peak pressure pulsations did not exceed the design pressure capacity for the associated piping class, exceed relief valve set points on the particular piping system, or cause transient loading of piping supports in excess of

their design limits. A summary of the pump discharge void size acceptance criteria is provided below:

Table 3: Allowable Initial Void Volume - Discharge Piping

System	Location	Acceptable Void Size
RH	RH Pump Discharge Piping	0.250 ft ³
CS	CS Pump Discharge Upstream of Pump Discharge Isolation Valve	0.250 ft ³
CS	CS Pump Discharge Downstream of Pump Discharge Isolation Valve	NA - See Note Below
SI	SI Pump Discharge (4" & Larger Piping)	0.250 ft ³
SI	SI Pump Discharge (2" & Under Piping)	0.100 ft ³

Note: CS piping is normally full of air by design.

The pump discharge void acceptance criteria have been revised from what was originally communicated in the Nine-Month Response (Reference 4). The criteria has been supplemented to include an acceptable void size for SI pump discharge piping that is 2" nominal diameter piping and smaller.

iii. Cumulative Void Limits

Cumulative void limits have been established for non-condensable gases entering the reactor coolant system (RCS) to ensure that the gas will not prevent the ECCS from performing its core cooling function. These limits were described in the Nine-Month Response (Reference 4) and have not changed.

c. Results of Walkdown and UT Examinations

As a result of the piping drawing review, laser scanning, manual slope measurements and analyses, a total of 46 locations (accessible and inaccessible) were identified as requiring UT examination. The UT examinations detected gas voids at seven of the 46 locations. The following is a summary of the UT examination results where gas voids were detected:

Table 4: Gas Voids Detected by UT Examination

System	High Point No.	Location	Acceptance Criteria	Measured Void Size
RH	OC-1-RH-S08	Train B Mini-Recirc Line	1.421 ft ³	0.001 ft ³
RH	IC-1-RH-S01	Shutdown Cooling Suction Line	1.421 ft ³	Indeterminate See Note
RH	IC-1-RH-S04	Shutdown Cooling Suction Line	1.421 ft ³	Indeterminate See Note
RH	IC-1-RH-D04	Shutdown Cooling Return Line	0.25 ft ³	0.011 ft ³
SI	OC-1-RH-D02	LHSI Train B Injection Line	0.25 ft ³	0.74 ft ³
SI	OC-1-RH-D03	LHSI Train B Injection Line	0.25 ft ³	
SI	IC-1-SI-D01	LHSI Train B Injection Line	0.25 ft ³	0.00005 ft ³

Note: Due to field conditions, direct measurement of the entire void could not be performed with UT examination.

The size of the gas voids detected at high points OC-1-RH-S08, IC-1-RH-D04 and IC-1-SI-D01 were extremely small (0.011 cubic feet or less). It was concluded that their size met the initial acceptance criteria and no further action was required.

The size of the gas voids detected in the RHR shutdown cooling suction piping at high points IC-1-RH-S01 and IC-1-RH-S04 could not be readily determined by UT examination due to field conditions. In the absence of complete UT results, an engineering evaluation was performed to conservatively quantify the size of the voids. The evaluation concluded that the gas voids were the result of fluid shrinkage that occurred after the RHR system was last secured from shutdown cooling operation, and that the voids would collapse when the system was aligned for operation. Procedure changes will be developed to minimize voids formed by fluid shrinkage in the common suction piping after securing the RHR system

from the shutdown cooling mode of operation. This corrective action is discussed in Section B.1 below.

The size of the gas voids detected in the Low Head Safety Injection (LHSI) Train B injection line at high points OC-1-RH-D02 and OC-1-RH-D03 were greater than the acceptance criteria. The gas voids actually formed one continuous void that spanned the entire length between the two adjacent high points. The initial assessment of this void concluded that Train B of LHSI was inoperable. Further assessment of the void found that system operability was not challenged. During this outage, new vent valves were installed at high points OC-1-RH-D02 and OC-1-RH-D03 to ensure that gas voids which may accumulate in the future can be effectively vented. Procedure changes were also implemented during this outage to specify use of the new vent valves during normal system filling and venting, and during the monthly surveillances which vent the ECCS. Additional procedure changes were implemented to ensure full-flow forward flushing of the LHSI discharge piping prior to returning Unit 1 to service. See Section A.4 below.

d. Post-Maintenance/Modification UT Examinations

Maintenance and plant modification activities performed during the fall 2008 refueling outage, which required draining and refilling of the SI, RHR and CS systems, were reviewed to identify the UT examinations required to verify the effectiveness of the filling and venting. Based on this review, eleven locations were selected for post-maintenance/post-modification UT examination. These UT examinations detected gas voids at three of the eleven locations. The following is a summary of the UT examination results where gas voids were detected:

Table 5: Gas Voids Detected by Post Maintenance/Modification UT Safety Injection System

High Point No.	Location	Acceptance Criteria	Measured Void Size
OC-1-RH-D02	LHSI Train B Injection Line	0.25 ft ³	0.005 ft ³
OC-1-RH-D03	LHSI Train B Injection Line	0.25 ft ³	0.31 ft ³
IC-1-SI-D05	LHSI Train B Injection Line	0.25 ft ³	0.002 ft ³

The size of the gas void detected in the LHSI Train B injection line at high point OC-1-RH-D03 was greater than the acceptance criteria. This was not an OPERABILITY concern because Unit 1 was in cold shutdown (MODE 5). The void was eliminated by performing a full-flow forward flush in accordance with plant procedures prior to returning the equipment to service. It is noteworthy that a gas void at this high point was previously detected during the initial UT examinations and that a new vent

valve had been installed to ensure adequate venting of the high point. Detecting a gas void in this location after it had been vented indicates that the location is susceptible to gas accumulation during normal operation of the RHR system. Plant procedures were revised to account for this susceptibility by requiring a full-flow forward flush of the LHSI discharge piping when the unit is transitioning from cold shutdown (MODE 5) to power operation (MODE 1). Subsequent evaluation concluded that gas accumulation in the LHSI Train B injection line could occur whenever RHR pump B is operated. Therefore, additional procedure revisions are being developed to ensure that venting of the LHSI Train B injection line is performed at appropriate times during the operating cycle, such as after RHR pump B surveillance testing.

The size of the gas voids detected at high points OC-1-RH-D02 and IC-1-SI-D05 were extremely small (0.005 cubic feet or less). It was concluded that their size met the initial acceptance criteria and no further action was required.

3. Vent Valves

As noted above, voids which exceeded pre-established acceptance criteria were detected at two high points in the LHSI Train B injection piping. New vent valves were installed at these high points during the fall 2008 refueling outage to ensure that gas voids which may accumulate in the future can be effectively vented. Procedure changes have been implemented to specify use of the new vent valves during normal system filling and venting, and during the monthly surveillances which vent the ECCS. The revised procedures are listed in Section A.4 below.

Modifications to existing vent valves were not required in any of the three affected systems.

The results of the walkdowns and UT examinations performed on inaccessible piping confirmed that the existing vent valves and the procedures that governed the filling and venting of this piping are adequate. Therefore, no changes have been identified concerning how vent valves in inaccessible piping will be utilized.

4. Procedures

A total of seven procedures have been revised that relate to GL 2008-01 activities since October 14, 2008.

Changes to incorporate the addition of two new vent valves on the LHSI Train B injection line were completed for the following procedures:

Table 6: Procedure Changes for New Vent Valves

Procedure	Procedure Title	Affected System(s)
CL 7A	Safety Injection System Checklist Unit 1	ECCS
CL 7B	Safety Injection System Checklist Unit 1	ECCS
OI 135	Fill and Vent the RHR System Unit 1	RHR/LHSI
OI 135B	Fill and Vent Train B RHR System Unit 1	RHR/LHSI
I-TS-ECCS-002	Safeguards System Venting (Monthly) Unit 1	ECCS

In addition, procedure revisions were completed for OP 1A , Cold Shutdown to Hot Standby, and IT 03B, LHSI Valve Exercise Test in Cold Shutdown, to ensure that full-flow forward flushing of the LHSI injection lines is performed during cold shutdown (MODE 5), prior to returning the unit to service.

B. DESCRIPTION OF NECESSARY ADDITIONAL COMMITMENTS AND CORRECTIVE ACTIONS

1. Additional Commitments and Corrective Actions

a. Additional Commitments

No additional regulatory commitments are being made in this response.

b. Additional Corrective Actions

The analyses, field walkdowns and UT examinations completed prior to and during the fall 2008 refueling outage have resulted in the following corrective actions:

- i. Two unvented high points in the LHSI Train B injection line were identified that are susceptible to gas accumulation. New vent valves were installed at these high points. See Section A.3 above.
- ii. Five procedure revisions have been implemented to incorporate the use of the two new vent valves that were installed during the fall 2008 refueling outage. These procedures govern the use of the new valves for filling and venting operations and during

monthly surveillances which vent the ECCS. See Section A.4 above.

- iii. Two procedure revisions have been implemented to ensure that full-flow forward flushing of the LHSI injection lines is performed during cold shutdown (MODE 5), prior to returning the unit to service. See Section A.4 above.
- iv. Procedure revisions are being developed to minimize the fluid shrinkage that can occur in the RHR shutdown cooling suction piping after the RHR system is secured from the shutdown cooling mode of operation. This action is being tracked by the Corrective Action Program (CAP) and will be completed by June 30, 2009.
- v. A review of RHR system operating, testing and surveillance procedures is ongoing to ensure that all possible RHR system operating scenarios provide the necessary direction for venting and/or flushing of the LHSI Train B injection line. Procedure revisions will be implemented as required. This action is being tracked by the CAP. Procedure revisions, if required, will be completed by June 30, 2009.
- vi. A review of Unit 1 high points will be performed to identify locations where new vent valves would provide enhanced venting capability during future system maintenance and venting evolutions. This action is being tracked by the CAP. This action will be completed by September 30, 2009.

2. Commitment and Corrective Action Updates

a. Commitment Updates

Four regulatory commitments were made in the FPL Energy Point Beach Letter NRC 2008-0075, Nine-Month Response to NRC Generic Letter 2008-01, dated October 14, 2008 (Reference 4). They are reaffirmed below with an update as appropriate.

- i. FPL Energy Point Beach will provide a complete Unit 1 GL 2008-01 submittal 90 days following the completion of the fall 2008 refueling outage. The submittal will include the complete evaluation reviews based upon detailed walk downs and ultrasonic testing of both accessible and inaccessible GL 2008-01 piping sections performed prior to and during the Unit 1 refueling outage. This response satisfies this commitment.
- ii. FPL Energy Point Beach will provide a complete Unit 2 GL 2008-01 submittal 90 days following the completion of the fall 2009 refueling outage. The submittal will include the complete evaluation reviews based upon detailed walk downs and necessary ultrasonic testing of inaccessible GL 2008-01 piping sections performed prior to and during the Unit 2 refueling outage.

- iii. FPL Energy Point Beach will monitor and support the industry and Nuclear Energy Institute (NEI) Gas Accumulation Management Team activities regarding the resolution of generic TS changes via the Technical Specification Task Force (TSTF) traveler process. FPL Energy Point Beach will review and evaluate the resolution of TS issues with respect to the changes contained in the TSTF traveler following NRC approval and Consolidated Line Item Improvement Process (CLIP) Notice of Availability of the TSTF traveler in the Federal Register. A license amendment request will be submitted to the NRC within 180 days following the evaluation, if necessary. Appropriate Bases changes associated with the potential TS will also be made. The completion date for this regulatory commitment is contingent upon the approval of the TSTF.
- iv. FPL Energy Point Beach will implement a long-term gas accumulation management program including creation of new and/or revising existing associated procedures. The program will consider ongoing industry efforts as well as developing site-specific criteria. The program will be implemented by June 30, 2009.

b. Corrective Action Updates

Corrective actions previously identified in the Nine-Month Response (Reference 4) as in-progress are summarized below, along with their present status.

ECCS Corrective Actions

- i. The current design change process will be evaluated to determine if additional guidance is needed regarding the potential for gas accumulation. This item will be completed by June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

- ii. The ongoing industry activities will be monitored to determine if additional changes to the PBNP Units 1 and 2 design may be required or desired to provide additional margin. Identified modifications will be tracked by the CAP. Completion of these items is dependent upon completion of the industry activities.

Status: This corrective action is in progress. Completion is dependent upon completion of the industry activities.

- iii. PBNP procedures will provide assurance that the total gas accumulation in all sections of the low head safety injection system cold leg and hot leg piping is verified to be less than 5 cubic feet of non-condensable gas at 100 psig. PBNP

procedures will also provide assurance that the total gas accumulation in all sections of the high head safety injection cold leg and hot leg piping is verified to be less than 5 cubic feet of non-condensable gas at 400 psig. Specific values may change based upon further analyses. This action will be completed by June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

Note: Use of the term "hot leg" derives from industry standard terminology. PBNP eliminated hot leg injection within the first few years of commercial operation. PBNP design for low head safety injection directs both trains of flow directly (and only) to the reactor vessel (also known as core deluge). Each train of high head safety injection provides cold leg injection to both loops and the "B" train can be cross-connected to each LHSI core deluge line.

- iv. FPL Energy Point Beach will consider procedure changes to perform appropriate post-maintenance fill UT verifications of the ECCS and CS systems. This corrective action will be completed prior to maintenance on the applicable systems, but no later than June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

- v. FPL Energy Point Beach will consider appropriate procedure revisions to include the location, the acceptance criteria, and the required frequency of monitoring for locations identified for periodic monitoring. Note that the location, acceptance criteria and frequency may be adjusted based upon operating history and additional analyses. This action will be completed by June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

- vi. FPL Energy Point Beach will implement a long-term gas accumulation management program including creating new and revising existing associated procedures. The program will consider ongoing industry efforts as well as developing specific acceptance criteria. This will be completed by June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

- vii. The procedure review identified proposed changes and provided recommendations for procedure revisions. Those procedures for which procedure revisions are to be made will be revised to ensure the system is "free of gas quantities that could jeopardize

ECCS operability.” These changes will be entered into the CAP. The CAP will establish the priorities for completion of the procedure revisions. Procedure revisions will be completed by June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

- viii. If new valves are installed in suction or discharge piping for the GL 2008-01 in-scope systems, the appropriate procedures will be revised in accordance with the modification process installing the new valves.

Status: To date, two new vent valves have been installed and all appropriate procedures which govern their use have been revised (see Section A.4 above). However, this corrective action will remain open until the scope of new vent valves for Unit 2 is finalized and the valves are installed.

Shutdown Cooling Corrective Action

- i. Fill and vent procedures were reviewed. Procedure enhancements were identified that will be entered into the CAP and completed by June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

Containment Spray Corrective Action

- i. As an interim measure prior to implementation for the TSTF CLIIP, new procedures will be implemented or existing procedures will be appropriately enhanced to include a post outage verification (frequency based upon operating history) that the CS system suction piping and the CS pumps and piping up to the first closed discharge line isolation valve are maintained sufficiently full of water by statically or dynamically venting system high points, UT or other acceptable methods. The identified procedure changes will be completed by June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

Generic Corrective Actions

- i. FPL Energy Point Beach will monitor the results of industry testing and analytical programs associated with allowable gas volume limits for pumps and piping. This corrective action will evaluate the results of industry testing and analytical efforts to determine if any additional changes to the applicable gas volume acceptance criteria are required. The completion date for this corrective action

is dependent upon the completion of the industry testing and analytical programs which were not completed prior to October 11, 2008. If changes to the acceptance criteria are needed, the changes will be entered into the CAP.

Status: These testing and analytical programs are in progress and to date the results are not available for evaluation. Monitoring of these programs is ongoing.

- ii. FPL Energy Point Beach will monitor the results of industry testing and analytical programs related to gas accumulation. FPL Energy Point Beach will evaluate the results of the industry testing and analytical efforts to determine if additional changes to licensing basis documents are required. The completion date for this corrective action is dependent upon the completion of the industry testing and analytical programs which was not complete prior to October 11, 2008.

Status: These testing and analytical programs are in progress and to date, results are not available for evaluation. Monitoring of these programs will continue.

- iii. FPL Energy Point Beach will monitor the long-term industry tasks identified that will provide additional tools to address GL 2008-01 with respect to pump gas void ingestion tolerance limits. These tools will be evaluated for incorporation into the PBNP processes and procedures. Those identified for use will be tracked by the CAP. Completion of these items is dependent upon the industry task completion.

Status: These long-term industry tasks are in progress and to date; additional tools are not available for evaluation. Monitoring of these tasks will continue.

- iv. Ongoing industry activities will be monitored by FPL Energy Point Beach to determine if additional changes to the PBNP Unit 1 and Unit 2 designs may be required or desired to provide additional margin. If modifications are determined to be necessary, they will be entered into the CAP. Completion of these items is dependent on the industry task completion.

Status: To date, results from ongoing industry activities have not indicated that additional design changes are required or desired. Monitoring of these activities will continue.

- v. Dynamic venting will be evaluated and where appropriate added to venting procedures. Identified changes will be entered into the CAP. The evaluation and appropriate procedure changes will be completed by June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

- vi. A discussion of the long-term gas accumulation management program will be inserted into the design basis documents for the SI, RHR and CS. These document revisions will be completed within 90 days following completion of the gas accumulation management program documents.

Status: This corrective action will be initiated upon issuance of the gas accumulation management program documents. The scheduled completion date is unchanged.

- vii. The existing Operations checklists and procedures will be updated as required to include the use of any vent valves not currently credited in the venting procedures. For the procedures needing revision, changes will be tracked via the CAP. This action will be completed by June 30, 2009.

Status: This corrective action is in progress. The scheduled completion date is unchanged.

Conclusion

FPL Energy Point Beach has evaluated the previously unevaluated portions of the applicable systems at PBNP Unit 1 that perform the functions described in the GL and has concluded that these systems are OPERABLE.