



April 17, 2009

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Point Beach Nuclear Plant, Units 1 and 2
Docket Nos. 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

Supplement to License Amendment Request 241
Proposed Technical Specifications for Primary Auxiliary Building Ventilation (VNPAB)

- References: (1) FPL Energy Point Beach LLC letter to NRC, dated December 8, 2008, License Amendment Request 241, Alternative Source Term (ML083450683)
- (2) FPL Energy Point Beach LLC letter to NRC, dated February 20, 2009, Supplement to License Amendment Request 241, Alternative Source Term (ML090540860)

Pursuant to 10 CFR 50.90, NextEra Energy Point Beach, LLC proposes to add TS 3.7.14, "Primary Auxiliary Building Ventilation (VNPAB)," to the Point Beach Nuclear Plant (PBNP) Technical Specifications (TS). In support of the new TS, the Table of Contents is also revised. The TS are contained in Appendix A of Renewed Facility Operating Licenses DPR-24 and DPR-27 for PBNP Units 1 and 2, respectively. The new TS is being proposed as part of License Amendment Request 241, Alternative Source Term, crediting the VNPAB exhaust function (Reference 1). This supplement fulfills the Regulatory Commitment made in Reference 2 to submit proposed TS for the VNPAB system by April 21, 2009.

Enclosure 1 provides a description of the proposed TS and revision to the table of contents. Enclosure 2 provides the proposed revised table of contents and TS. Enclosure 3 provides the proposed TS Bases. The TS Bases are being provided for information only to assist the Commission in its review and NextEra Energy Point Beach is not requesting approval of the Bases.

This supplement contains no new Regulatory Commitments.

The PBNP Plant Operations Review Committee has reviewed the proposed license amendment request.

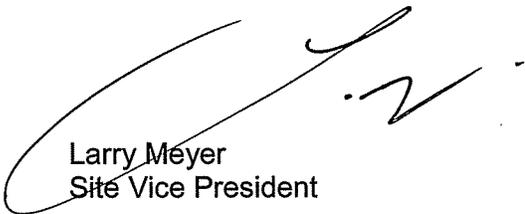
In accordance with 10 CFR 50.91, a copy of this application with the enclosure is being provided to the designated Wisconsin Official.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 17, 2009.

Very truly yours,

NextEra Energy Point Beach, LLC



Larry Meyer
Site Vice President

Enclosures

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
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ENCLOSURE 1

**NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

**SUPPLEMENT TO LICENSE AMENDMENT REQUEST 241
PROPOSED TECHNICAL SPECIFICATIONS FOR PRIMARY
AUXILIARY BUILDING VENTILATION (VNPAB)**

DESCRIPTION AND EVALUATION OF CHANGE

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1.0 SUMMARY DESCRIPTION

This license amendment request proposes to revise Appendix A of Renewed Facility Operating Licenses DPR-24 and DPR-27 for NextEra Energy Point Beach, LLC (NextEra Energy Point Beach) Units 1 and 2, respectively. It is provided in response to a Regulatory Commitment contained in Reference 6.1 to submit proposed Technical Specifications (TS) for the Primary Auxiliary Building Ventilation System (VNPAB) no later than April 21, 2009.

2.0 DESCRIPTION OF CHANGES

The proposed change will add new TS 3.7.14 for the VNPAB to the Point Beach Nuclear Plant (PBNP) TS. TS 3.7.14 will require the VNPAB to be operable in MODES 1, 2, 3, and 4. The new Conditions, Required Actions, Completion Times, and Surveillance Requirements are closely modeled after the Control Room Emergency Filtration System (CREFS) in the PBNP TS. The proposed change also updates the Table of Contents of the TS to incorporate the new TS.

This new TS is being proposed as a result of Alternative Source Term (AST) assumptions crediting the VNPAB exhaust function (Reference 6.2). The AST Loss of Coolant Accident (LOCA) Emergency Core Cooling System (ECCS) leakage dose analysis assumes that a portion of the activity is released to the environment via the Primary Auxiliary Building (PAB) vent stack. Consequently, the VNPAB exhaust meets Criterion 3 for establishment of a TS per 10 CFR 50.36(c)(2)(ii), "A structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier."

The specific changes included in this proposed change include:

1. The Table of Contents is revised as follows:
"3.7.14 Primary Auxiliary Building Ventilation (VNPAB) 3.7.14-1"
2. Section 3.7.14 added which states:
"3.7.14 Primary Auxiliary Building Ventilation (VNPAB)"
3. LCO 3.7.14 added which states:
"LCO 3.7.14 VNPAB shall be OPERABLE."
4. Applicability added which states:
"APPLICABILITY: MODES 1, 2, 3, and 4."
5. Condition A. added which states:
"A. VNPAB inoperable."

6. Required Action A.1 added which states:
"A.1 Restore VNPAB to OPERABLE status."
7. Completion Time for Required Action A.1 added which states:
"7 days"
8. Condition B. added which states:
"B. Required Action and associated Completion Time not met."
9. Required Action B.1 added which states:
"B.1 Be in MODE 3."
10. Completion Times for Required Action B.1 added which states:
"6 hours"
11. Required Action B.2 added which states:
"B.2 Be in MODE 5."
12. Completion Time for Required Action B.2 added which states:
"36 hours"
13. Surveillance Requirement SR 3.7.14.1 added which states:
"SR 3.7.14.1 Operate the VNPAB for \geq 15 minutes."
14. Frequency for SR 3.7.14.1 added which states:
"31 days"
15. Surveillance Requirement SR 3.7.14.2 added which states:
"SR 3.7.14.2 Verify VNPAB manual start capability and alignment."
16. Frequency for SR 3.7.14.2 added which states:
"18 months"

3.0 TECHNICAL EVALUATION

As part of the revised Design Basis Accident (DBA) radiological dose analysis implementing AST, the VNPAB exhaust system fans are credited to mitigate radiological doses to control room personnel. The LOCA ECCS leakage DBA radiological analysis assumes that the VNPAB vent stack is a release location for control room dose calculations (ECCS leakage is modeled as released via the refueling water storage tank vent as well as the VNPAB vent stack). To ensure that ECCS equipment leakage activity is released from the VNPAB vent stack, one of two VNPAB exhaust fans is assumed to operate.

The current VNPAB exhaust system ensures that the PAB vent stack is the source of the emission associated with the ECCS equipment leakage during the containment sump recirculation phase following a large break LOCA (Reference 6.3). This is accomplished by providing exhaust flow from areas outside of containment which have possible contamination due to ECCS equipment leakage.

The VNPAB exhaust system consists of two filter fans, two stack fans and the associated ducts and dampers necessary to establish the required exhaust flow paths. Exhaust air is filtered through roughing and high efficiency filters for removal of particulates. The air exhausted from the primary auxiliary building is continuously monitored by a noble gas radiation monitor. A detector output above its setpoint will initiate exhaust filtration through activated charcoal filters. No filters are credited in the dose analyses (Reference 6.2).

The control room dose analysis assumes that the ECCS leakage activity release pathway X/Q to be at the location of the PAB vent stack (Reference 6.2). Operation of the VNPAB exhaust fans assures this release point.

The VNPAB filter and stack fans have been included in the emergency diesel generator loading profile during the containment sump recirculation phase of the large break LOCA following a Loss of Offsite Power (LOOP). The AST LOCA ECCS equipment leakage analysis assumes that the VNPAB exhaust is started within 30 minutes of alignment of Residual Heat Removal (RHR) in the containment sump recirculation phase (Reference 6.2).

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

AST implementation is governed by 10 CFR 50.67, the guidelines of the Standard Review Plan (NUREG-0800), Section 15.0.1, Revision 0, "Radiological Consequence Analyses Using Alternate Source Terms" (ML003734190) and Regulatory Guide (RG) 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," dated July 2000 (ML003716792).

4.2 Precedent

There are numerous precedents for NRC approval of AST implementation in accordance with 10 CFR 50.67, including instances in which Non-Engineered Safety Features (ESF) systems are used to mitigate the consequences of a DBA. A similar request was made for the Edwin I. Hatch Nuclear Plant, regarding the Turbine Building Ventilation Exhaust System Fans. Southern Nuclear Operating Company added TS for the Hatch turbine building vent system, which is a non-ESF system credited in the AST dose assumptions for mitigating the dose to control room operators (ML081780683). This system was originally designed for turbine building cooling during normal plant control.

4.3 Significant Hazards Consideration

The proposed change would add new TS 3.7.14, Primary Auxiliary Building Ventilation (VNPAB), to credit the VNPAB exhaust function as part of the AST assumptions for large break LOCA ECCS equipment leakage. The assumption that VNPAB exhaust flow be made available within 30 minutes of the alignment of RHR to containment sump recirculation following a large break LOCA is an AST assumption documented in detail in the initial AST submittal (Reference 6.2).

The standards used to arrive at a determination that a request for an amendment involves a no significant hazards consideration are included in 10 CFR 50.92, which states that no significant hazards considerations are involved if the operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

NextEra Energy Point Beach has evaluated the proposed amendment in accordance with 10 CFR 50.91 against the standards of 10 CFR 50.92 and has determined that the operation of PBNP in accordance with the proposed amendment presents no significant hazards. The NextEra Energy Point Beach evaluation against each of the criteria in 10 CFR 50.92 follows:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The VNPAB exhaust is relied upon after an accident has been initiated to provide the AST LOCA ECCS equipment leakage activity release location for the control room dose calculation. The results of the LOCA radiological analysis demonstrate that while operating the VNPAB exhaust system, as supported by the proposed TS, the dose consequences of this limiting event are within the regulatory limits and guidance provided by the NRC in 10 CFR 50.67 and RG 1.183 (Reference 6.2).

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed TS change reflects the plant configuration that is required to implement the AST analyses, and no new or different accidents result from utilizing the proposed changes. The LOCA control room dose analysis assumes that the ECCS equipment leakage activity release pathway X/Q to be at the location of the PAB vent stack. Operation of the VNPAB exhaust fans assures this release point. The VNPAB system operates during normal unit operation.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

The proposed TS reflects the plant configuration that is required to implement the AST analyses. The VNPAB assures the proper X/Q for airborne radiological protection for control room personnel, as demonstrated by the control room dose analyses for the LOCA. Safety margins and analytical conservatisms have been evaluated and have been found to be acceptable. The proposed changes ensure that the dose consequences in the control room due to the DBA LOCA are within the acceptance criteria presented in 10 CFR 50.67. The margin of safety for the radiological consequences of these accidents is provided by meeting the regulatory limit.

Therefore, the proposed change does not involve a significant reduction in margin of safety.

Based on the above, NextEra Energy Point Beach concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified. The Plant Operations Review Committee has reviewed this proposed supplement to the license amendment request and concurs with this conclusion.

4.4 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operating in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulation, and (3) the issuances of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

NextEra Energy Point Beach has determined that operating with the proposed supplement to the license amendment request would not result in any significant change in the types, or significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed license amendment is eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed license amendment supplement.

6.0 REFERENCES

- 6.1 FPL Energy Point Beach LLC letter to NRC, dated February 20, 2009, Supplement to License Amendment Request 241, Alternative Source Term (ML090540860)
- 6.2 FPL Energy Point Beach, LLC letter to NRC, dated December 8, 2008, License Amendment Request 241, Alternative Source Term (ML083450683)
- 6.3 Point Beach Nuclear Plant FSAR, Section 14.3.5, Radiological Consequences of a Loss-of-Coolant Accident

ENCLOSURE 2

**NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

**SUPPLEMENT TO LICENSE AMENDMENT REQUEST 241
PROPOSED TECHNICAL SPECIFICATIONS FOR PRIMARY
AUXILIARY BUILDING VENTILATION (VNPAB)**

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3.7 PLANT SYSTEMS

3.7.14 Primary Auxiliary Building Ventilation (VNPAB)

LCO 3.7.14 VNPAB shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. VNPAB inoperable.	A.1 Restore VNPAB to OPERABLE status.	7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.14.1 Operate the VNPAB for \geq 15 minutes.	31 days
SR 3.7.14.2 Verify VNPAB manual start capability and alignment.	18 months

ENCLOSURE 3

**NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

**SUPPLEMENT TO LICENSE AMENDMENT REQUEST 241
PROPOSED TECHNICAL SPECIFICATIONS FOR PRIMARY
AUXILIARY BUILDING VENTILATION (VNPAB)**

**PROPOSED TECHNICAL SPECIFICATION BASES
(FOR INFORMATION ONLY)**

3 pages follow

B 3.7 PLANT SYSTEMS

B 3.7.14 Primary Auxiliary Building Ventilation (VNPAB)

BASES

BACKGROUND

The VNPAB exhaust system ensures that the primary auxiliary building vent stack is the source of the release associated with the ECCS equipment leakage during the containment sump recirculation phase of a large break LOCA, by providing exhaust flow from areas which have possible contamination. No minimum VNPAB exhaust flow rate is assumed in the LOCA dose analysis. The VNPAB system operates during normal unit operation.

The VNPAB exhaust system consists of two filter fans (W-30A/B), two stack fans (W-21A/B), and the associated ductwork and backdraft dampers necessary to the extent that the required exhaust flow path can be maintained.

Exhaust air is filtered through roughing and high efficiency filters (F-29) for removal of particulates. The air exhausted from the primary auxiliary building is continuously monitored by a noble gas radiation monitor (RE-214). A detector output above its set point will initiate exhaust filtration through activated charcoal filters (F-23). No filters are credited in the dose analyses.

The LOCA control room dose analysis assumes that the ECCS equipment leakage activity release pathway X/Q to be at the location of the PAB vent stack. Operation of the VNPAB exhaust fans assures this release point.

The VNPAB does not automatically restart after being load shed following a loss of offsite power, and manual Operator action from the Control Room is required to restart VNPAB within 30 minutes following the alignment of RHR to containment sump recirculation. The VNPAB filter and stack fans have been included in the emergency diesel generator loading profile during the recirculation phase of a loss of coolant accident.

BASES

APPLICABLE SAFETY ANALYSES The VNPAB assures the proper X/Q for airborne radiological protection for control room personnel, as demonstrated by the control room dose analyses for the LOCA.

The VNPAB satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO The VNPAB exhaust is required to be OPERABLE to ensure that the control room habitability limits are met following the LOCA. The VNPAB is considered OPERABLE when individual components necessary to ensure that the primary auxiliary building vent stack is the source of the radiological emission associated with ECCS equipment leakage during the containment sump recirculation phase are OPERABLE. The VNPAB is considered OPERABLE when:

- a. Both VNPAB filter fans (W-30A and W-30B) are OPERABLE;
 - b. Both VNPAB stack fans (W-21A and W-21B) are OPERABLE;
 - c. Ductwork and backdraft dampers are OPERABLE to the extent that an exhaust path can be maintained; and
 - d. VNPAB exhaust is capable of being manually initiated.
-

APPLICABILITY In MODES 1, 2, 3, and 4, VNPAB must be OPERABLE to control operator exposure during a large break LOCA.

ACTIONS A.1

When VNPAB is inoperable, action must be taken to restore the system to OPERABLE status within 7 days. The 7 day Completion Time is based on the low probability of a LOCA challenging control room habitability occurring during this period.

B.1 and B.2

If VNPAB cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Time is reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

**SURVEILLANCE
REQUIREMENTS**

SR 3.7.14.1

One filter and one stack fan are normally in operation. Standby fans should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not severe, testing each fan subsystem once every month provides an adequate check of this system. Systems without heaters need only be operated for ≥ 15 minutes to demonstrate the function of the system. The 31 day Frequency is based on the reliability of the equipment.

SR 3.7.14.2

This test verifies manual actuation capability for VNPAB. Manual actuation capability is required for OPERABILITY of the VNPAB. The 18 month Frequency is acceptable based on the inherent reliability of manual actuation circuits.

REFERENCES

1. FSAR. Section 9.5.
 2. FSAR. Section 14.3.5.
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