

From: Poole, Justin
Sent: Tuesday, March 16, 2010 9:38 AM
To: 'Hale, Steve'; 'COSTEDIO, JAMES'
Subject: Draft Request for Additional Information from Quality and Vendor Branch RE: EPU

Steve

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated April 7, 2009 (Agencywide Documents Access and Management System Accession No. ML091250564), FPL Energy Point Beach, LLC, submitted a request to increase each unit's licensed core power level from 1540 megawatts thermal (MWt) to 1800 MWt reactor core power, and revise the technical specifications to support operation at this increased core thermal power level.

The Quality and Vendor Branch has reviewed the information provided, and determined that in order to complete its evaluation, additional information is required. We would like to discuss the questions, in draft form below, with you in a conference call.

This e-mail aims solely to prepare you and others for the proposed conference call. It does not convey a formal NRC staff position, and it does not formally request for additional information.

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EQVB 2.12-1: Section 2.12 of Attachment 5, "Licensing Report," of the EPU LAR, does not completely address the staff's general guidance and specific review criteria discussed in NRC Standard Review Plan (SRP) SRP 14.2.1, "Generic Guidelines for Extended Power Uprate Testing Programs." The SRP is part of Matrix 12 of NRC Review Standard for Power Upgrades (RS-001) and is used by the staff in evaluating whether a licensee's proposed EPU PATP meets NRC regulations. Provide a revision to Section 2.12, of Attachment 5, which addresses how the proposed EPU PATP complies with the staff guidance and review criteria provided in Sections III.A through III.D of SRP 14.2.1.

Additionally, reference is made throughout Attachment 5, specifically Section 2.12.1.2.6, "Justification for Exception to Transient Testing," to "draft" SRP 14.2.1. Initial issuance of the SRP, draft Revision 0, dated December 2002, was superceded in August 2006 when the SRP became final. Revise Attachment 5, as applicable, referencing the proposed EPU PATP to the final version of SRP 14.2.1, dated August 2006.

EQVB 2.12-2: Section 1.0 of Attachment 5 states that the PBNP evaluations have been... "formatted and documented in accordance with the template and criteria

provided in RS-001. However, the section titled "Scope and Associated Technical Review Guidance, Matrix 12," is not included in Appendix C of Attachment 5. Revise Appendix C of Attachment 5, as applicable, to include this reference.

EQVB 2.12-3: Section 2.12.1.2 of Attachment 5 states that the licensee has... "benefited from industry operating experience gained from discussions with other recently uprated PWRs (e.g., Ginna and Kewanee) and INPO." However, in Section 2.12.1.2.6, "Justification for Exception to Transient Testing," of Attachment 5, a discussion of such industry or PBNP plant-specific operating experience is not provided. Such information may be considered by the staff to support the basis for the licensee's request not to perform certain transient tests (e.g., Tests 14, 33 and 35) as part of the proposed EPU PATP. The licensee's primary basis for not performing such transient testing as part of the proposed EPU LAR appears to rely solely on an analytical justification using LOFTRAN. Revise Attachment 5, as applicable, to include a discussion of such industry and plant-specific operating experience relative to the staff's review criteria discussed in Section III.C.2 of SRP 14.2.1.

EQVB 2.12-4: Section 2.12.1.1, of Attachment 5, states that detailed information regarding performance of the original PATP was provided to the Atomic Energy Commission in the 1971-1973 timeframe. However, information is not provided in the LAR regarding the details and outcomes of such testing, specifically the scope of transient testing. Also, FSAR Section 13.4, "Initial Testing in the Operating Reactor," and Table 2.12-2 of Attachment 5, do not provide sufficient information regarding such testing. Revise Section 2.12.1.1, as applicable, to include a discussion regarding performance of such original PATP tests, with emphasis on the performance of transient Tests 14, 33 and 35. Such information is necessary for the staff to consider in support of the licensee's justification for not performing certain startup tests, including transient tests, as part of the licensee's proposed EPU PATP.

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