

June 11, 2010

NRC 2010-0046 GL 2004-02

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

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

<u>Supplemental Response for Extension Request for Completion of Actions for Generic Letter</u>
<u>2004-02 Potential Impact for Debris Blockage in Emergency Recirculation During Design Basis</u>
Accidents at Pressurized-Water Reactors (TAC No. MC4705/MC4706)

References:

- (1) NRC letter to NextEra Energy Point Beach, LLC, dated June 30, 2009, Point Beach Nuclear Plant, Units 1 and 2, GSI-191/GL 2004-02, Additional Extension Request Approval (TAC Nos. MC4705 and MC4706) (ML091800430)
- (2) NextEra Energy Point Beach, LLC letter to NRC, dated February 19, 2010, Request for Extension of Completion Date for Generic Letter 2004-02, Potential Impact for Debris Blockage in Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors (TAC No. MC4705/MC4706) (ML100500632)
- (3) NRC Memorandum dated May 17, 2010, Staff Requirements Briefing on Resolution of Generic Safety Issue (GSI) 191, Assessment of Debris Accumulation in Pressurized Water (PWR) Sump Performance (M100415)

Via Reference (1), the Commission granted a request submitted by NextEra Energy Point Beach, LLC (NextEra) for an extension to achieve compliance with the provisions of GL 2004-02. The extension was approved until June 30, 2010, for Point Beach Nuclear Plant (PBNP) Unit 1, and to June 30, 2011 for Unit 2, respectively.

In Reference (2), NextEra requested an additional extension to achieve compliance with the provisions of GSI-191/GL 2004-02 at PBNP by June 30, 2013, for Unit 1, and by December 31, 2012, for Unit 2. The purpose of this letter is to replace the extension requested by Reference (2) by this letter.

Recent NRC and industry discussions have revealed there are a number of issues that have not yet been resolved for GSI-191 (GL 2004-02) and that a clear and acceptable path needs to be defined to resolve the issues. On May 17, 2010, the Commission directed the NRC staff (Reference 3) to submit information on potential approaches that might be implemented to bring GSI-191 (GL 2004-02) to closure pending further direction from the Commission.

The request stated that discussion of the options should include such factors as the Commission's ALARA policy concerning radiation dose, worker hazardous material exposure and risk-informed versus deterministic treatment of remaining elements, such as determining the zone of influence, application of General Design Criterion 4, consideration of in-vessel effects of different types of fuel, etc.

Due to the uncertainties currently surrounding resolution of GSI-191 (GL 2004-02), milestones contained in the Reference (2) extension request require revision. During a teleconference held on June 7, 2010, between NextEra and the NRC, NextEra stated that an updated path moving forward, including a plan with milestones, would be submitted to the NRC within 60 days following Commission direction to the NRC staff based on their review of the information submitted by the NRC staff to address the NRC Memorandum dated May 17, 2010 (M100415). Following the NextEra submittal, the NRC would take an additional 30 days to review and respond to this approach. During the teleconference, the NRC stated that this was an acceptable approach.

Accordingly, NextEra makes the following commitment:

Within 60 days following establishment of sufficient Commission direction to resolve the remaining GSI-191 issues, PBNP will submit to the NRC a plan with milestones to achieve final resolution.

Therefore, NextEra requests an extension for PBNP Unit 1 for 90 days beyond receipt of the above noted Commission direction.

The extension to achieve compliance with the provisions of GL 2004-02 that was approved by the NRC in Reference (1) for PBNP Unit 2 to June 30, 2011, remains unchanged and an additional extension is not requested at this time.

If you have questions or require additional information, please contact Ms. Fritzie Flentje at 920/755-7656.

In accordance with the provisions of 10 CFR 50.91, a copy of this submittal has been provided to the designated Wisconsin Official.

Very truly yours,

NextEra Energy Point Beach, LLC

Łarry Meyer

Site Vice President

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

Administrator, USNRC Region III

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