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

Point Beach Nuclear Plant, Units 1 and 2 Dockets No. 50-266 and 50-301 Renewed License Nos. DPR-24 and DPR-27

Consolidation of License Renewal Regulatory Commitment 8 With Commitment 29 Reactor Vessel Internals Program Implementation

- References: (1) Nuclear Management Company, LLC letter to NRC, dated February 25, 2004, Application for Renewed Operating License, (ML040580023)
 - (2) NUREG-1839, Safety Evaluation Report Related to the License Renewal of the Point Beach Nuclear Plant, Units 1 and 2, dated December 2005 (ML053420134 and ML053420137)
 - (3) NextEra Energy Point Beach, LLC letter to NRC, dated October 2, 2009, License Renewal Commitment, Reactor Vessel Internals Program Submittal (ML092750419)
 - (4) NextEra Energy Point Beach, LLC letter to NRC, dated April 23, 2010, Revision to License Renewal Regulatory Commitment 29, Reactor Vessel Internals Program Implementation (ML101160025)

Nuclear Management Company, LLC, former license holder for Point Beach Nuclear Plant (PBNP), Units 1 and 2, submitted an application for renewed operating licenses via Reference (1). Commitment 9 of the application contained the following proposed Regulatory Commitment:

"PBNP will implement the NRC approved industry activities resulting from the MRP, as appropriate, to manage any applicable effects identified through the EPRI MRP effort (RVI Related)." The due date or frequency of this commitment was proposed to be "prior to the period of extended operation."

The proposed Regulatory Commitment was subsequently documented in Reference (2), Appendix A, Commitments for License Renewal of PBNP, as Commitment 8. The PBNP reactor vessel internals program was submitted to the Commission for review and approval via Reference (3).

Via Reference (4), a revision to License Renewal Regulatory Commitment 29 was submitted because NRC approval of the Reactor Vessel Internals Program was not likely to occur prior to October 5, 2010, when PBNP Unit 1 will enter the period of extended operation (PEO).

In Reference (4), Commitment 8 was addressed in Item 1, but not specifically identified as a predecessor activity that must occur prior to implementing Commitment 29. Item 1 stated that implementation of Commitment 29 was dependent upon, "Commission review and approval of Electric Power Research Institute (EPRI) Topical Report 1016596, "Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227)" (TAC ME08680) (ML090160204). "

Therefore, via Reference (4), it was recognized by NextEra that the PBNP reactor vessel internals program must incorporate applicable elements of MRP-227 in order for the program to be approved by the Commission.

To minimize duplicative tracking of Regulatory Commitments associated with implementation of the reactor vessel internals program, NextEra is consolidating Commitment 8 with Commitment 29.

Summary of Regulatory Commitment Change

Commitment 29 currently states:

"Implement an enhanced reactor vessel internals program." The due date of this commitment is "within 180 days following approval of the program by the NRC."

Revised Commitment 29 states:

"Implement an enhanced reactor vessel internals program that incorporates EPRI Topical Report 1016596, "Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227)." The due date for implementation of this commitment is "within 180 days of approval of the program by the NRC."

Please contact Mr. James Costedio at 920/755-7427 if there are questions regarding this proposed Regulatory Commitment change.

Very truly yours,

NextEra Energy Point Beach, LLC

Larry Meyer

Site Vice President

cc: Administrator, Region III, USNRC

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