

January 11, 2011

NRC 2011-0009 10 CFR 50.90

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>License Amendment Request 261</u> <u>Extended Power Uprate</u> Response to Request for Clarification

References:

- (1) FPL Energy Point Beach, LLC letter to NRC, dated April 7, 2009, License Amendment Request 261, Extended Power Uprate (ML091250564)
- (2) NRC electronic mail to NextEra Energy Point Beach, LLC, dated December 16, 2010, Point Beach Units 1 and 2 NRC Staff Response re: December 15, 2010, Teleconference Associated with Environmental Qualification Questions (ML110070495)

NextEra Energy Point Beach, LLC (NextEra) submitted License Amendment Request (LAR) 261 (Reference 1) to the NRC pursuant to 10 CFR 50.90. The proposed amendment would increase each unit's licensed thermal power level from 1540 megawatts thermal (MWt) to 1800 MWt, and revise the Technical Specifications to support operation at the increased thermal power level.

Via Reference (2), the NRC staff determined that additional information is required to enable the staff's continued review of the request. Enclosure 1 provides the NextEra response to the NRC staff's request for additional information.

This letter contains no new Regulatory Commitments and no revisions to existing Regulatory Commitments.

The information contained in this letter does not alter the no significant hazards consideration contained in Reference (1) and continues to satisfy the criteria of 10 CFR 51.22 for categorical exclusion from the requirements of an environmental assessment.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 11, 2011.

Very truly yours,

NextEra 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 1

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

LICENSE AMENDMENT REQUEST 261 EXTENDED POWER UPRATE RESPONSE TO REQUEST FOR CLARIFICATION

The NRC staff determined that additional information was required (Reference 1) to enable the Electrical Engineering Branch to complete the review of License Amendment Request (LAR) 261, Extended Power Uprate (EPU) (Reference 2). The following information is provided by NextEra Energy Point Beach, LLC (NextEra) in response to the NRC staff's request for clarification.

Question 1

What guidance was used to qualify components impacted by the Point Beach EPU, AST, and HELB? Were the components qualified to Category 1 requirements?

NextEra Response

The guidance of Institute of Electrical and Electronics Engineers (IEEE) 323-1974, "IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations," which meets Category 1 requirements, was used for equipment already qualified to this standard or any new equipment to be qualified. The Division of Operating Reactors (DOR) guidelines was used for existing original equipment qualified to DOR guidelines.

Question 2

Based on the December 15, 2010, teleconference, for cables, using double peak temperature alone is not acceptable to the NRC staff. Cables should be qualified in accordance with IEEE 323-1974 guidance. IEEE 323-1974 requires a double peak <u>plus</u> a 15°F margin.

NextEra Response

As discussed with the NRC staff on January 6, 2011, an additional EQ test report has been obtained that provides the EQ qualification temperature margin required by IEEE 323-1974. This test report will be used in conjunction with the equipment qualification identified in Reference (3) to ensure qualification in accordance with IEEE 323-1974. The EQ qualification information related to the instrument cables for the steam line pressure transmitters (first item of Table EEEB-1 in Reference (3)), is replaced with the information provided in Table 1.

Table 1

Equipment	Manufacturer	Number	Reason for	Location	EPU	Equipment
Description	Information	per Unit	Replacement		Harsh Environment	Qualification
Instrument cables for steam line pressure transmitters	Rockbestos Firewall III	2	Increased harsh environment temperatures due to EPU	Containment Fan Rooms in Primary Auxiliary Building	363°F (MSLB) (336°F inside conduit)	341°F (double peak test report) 450°F (single peak test report) The test temperature profiles for both test reports bound the inside conduit cable temperature profile following a MSLB.

Question 3

The NRC staff requests a summary of thermal-lag analysis to show that the intended function of the equipment will have been completed before the peak temperature is reached. It must then be shown that when the peak temperature is reached and thermal soaking (thermal equilibrium) is reached, the equipment will not experience subsequent failure that would affect other safety systems or, mislead the operator during the DBE.

NextEra Response

As stated in the NextEra Response to Question 2 above, the EQ qualification temperature margin requirements of IEEE 323-1974 are met. The Rockbestos cable test temperatures and durations demonstrate that cable failure during and after a high energy line break (HELB) event will not occur.

References

- (1) NRC electronic mail to NextEra Energy Point Beach, LLC, dated December 16, 2010, Point Beach Units 1 and 2 NRC Staff Response re: December 15, 2010, Teleconference Associated with Environmental Qualification Questions (ML110070495)
- (2) FPL Energy Point Beach, LLC letter to NRC, dated April 7, 2009, License Amendment Request 261, Extended Power Uprate (ML091250564)
- (3) NextEra Energy Point Beach, LLC letter to NRC, dated December 13, 2010, License Amendment Request 261, Extended Power Uprate, Response to Request for Additional Information (ML103480112)