



June 23, 2011

NRC 2011-0066
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

License Amendment Request 254
Removal of the Table of Contents
from Technical Specifications

Pursuant to 10 CFR 50.90, NextEra Energy Point Beach, LLC, (NextEra) hereby requests an amendment to Renewed Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant (PBNP) Units 1 and 2. The proposed amendment revises the Technical Specifications (TS) to remove the table of contents (TOC) from the TS and place it under licensee control.

Enclosure 1 provides a description and evaluation of the proposed TS changes including the No Significant Hazards Consideration, and environmental considerations. Enclosure 2 provides the TS TOC pages. The TS TOC pages are being provided for information.

Approval of the proposed amendment is requested by June 23, 2012. NextEra will implement the amendment within 90 days of Commission approval.

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

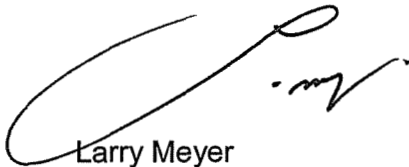
In accordance with 10 CFR 50.91, a copy of this letter with enclosures is being provided to the designated Wisconsin Official.

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

I declare under penalty of perjury that the foregoing is true and correct.
Executed on June 23, 2011.

Very truly yours,

NextEra Energy Point Beach, LLC

A handwritten signature in black ink, appearing to read 'Larry Meyer', is written over the printed name.

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 254
REMOVAL OF THE TABLE OF CONTENTS
FROM TECHNICAL SPECIFICATIONS**

DESCRIPTION AND EVALUATION OF CHANGES

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
 - 2.1 Proposed Changes
- 3.0 TECHNICAL EVALUATION
- 4.0 REGULATORY EVALUATION
 - 4.1 Applicable Regulatory Requirements/Criteria
 - 4.2 Precedent
 - 4.3 No Significant Hazards Consideration
 - 4.4 Conclusions
- 5.0 ENVIRONMENTAL CONSIDERATION
- 6.0 REFERENCES

1.0 SUMMARY DESCRIPTION

This evaluation supports the NextEra Energy Point Beach, LLC (NextEra) request to amend renewed Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant (PBNP) Units 1 and 2, respectively. The proposed changes would revise the Technical Specifications (TS) to remove the table of contents from the TS and place it under licensee control.

2.0 DETAILED DESCRIPTION

The table of contents (TOC) for the TS is not being eliminated. Following approval of this license amendment request (LAR), the responsibility for maintenance and issuance of updates to the TS TOC will transfer from the NRC to NextEra. The TOC will no longer be included in the TS and as such will no longer be part of the TS (Appendix A to the Operating License).

2.1 Proposed Change

Remove the TOC from the TS and place it under NextEra (licensee) control. Note that no TS pages will be issued as a result of this proposed change.

3.0 TECHNICAL EVALUATION

The TS TOC does not meet the criteria specified in 10 CFR 50.36 requiring its inclusion within the plant TS. 10 CFR 50.36(b) states:

Each license authorizing operation of a production or utilization facility of a type described in § 50.21 or § 50.22 will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to § 50.34.

The result of the NextEra review of 10 CFR 50.36 indicates that the TS TOC was not listed in the regulation as one of the categories listed in 10 CFR 50.36(c).

10 CFR 50.36(a) indicates that a license application may provide other information associated with the TS, and gives an example of this information, i.e., the TS Bases, but also clearly indicates that the Bases are not a part of the TS. 10 CFR 50.36(a)(1) states:

Each applicant for a license ... shall include in his application proposed technical specifications in accordance with the requirements of this section. A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications.

Additionally, the "Writer's Guide for Plant-Specific Improved Technical Specifications" (ITS) (Reference 1) was reviewed for guidance. The writer's guide refers to the TOC as "Technical Specification Front Matter," which also includes the Title Page and List of Effective Pages. The writer's guide describes the TS content as starting with Chapter 1, "Use and Application," and does not include the TOC as part of the content of the TS.

A TOC for the TS will be maintained under NextEra (licensee) control. The TOC will be issued by NextEra in conjunction with the implementation of NRC-approved TS amendments.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.36(a) states that "Each applicant for a license ... shall include in his application proposed technical specification in accordance with the requirements of this section. A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specification." Similar to the TS Bases, the TOC does not meet the criteria specified in 10 CFR 50.36 for inclusion within a plant's TS.

NextEra has evaluated this change against the applicable regulatory requirements as described above. Based on this, there is reasonable assurance that the health and safety of the public, following approval of this change will remain unaffected.

4.2 Precedent

- Calvert Cliffs Nuclear Power Plant License Amendment Nos. 293 and 269 were issued by the NRC on September 21, 2009 (Reference 2).
- Monticello Nuclear Generating Plant, License Amendment No. 152, was issued by the NRC on November 8, 2007 (Reference 3).

4.3 No Significant Hazards Consideration

NextEra has evaluated the proposed amendment in accordance with 10 CFR 50.91 against the standards in 10 CFR 50.92 and has determined that the operation of the facility in accordance with the proposed amendment presents no significant hazards consideration. NextEra evaluation against each of the criteria in 10 CFR 50.92 is discussed below.

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

Response: No.

The proposed amendment is administrative and affects control of a document, the TOC, listing the specifications in the plant TS. Transferring control from the NRC to NextEra does not affect the operation, physical configuration, or function of plant equipment or systems. The proposed amendment does not impact the initiators or assumptions of analyzed events; nor does it impact the mitigation of accidents or transient events. Therefore, the proposed amendment 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 amendment is administrative and does not alter the plant configuration, require installation of new equipment, alter assumptions about previously analyzed accidents, or impact the operation or function of plant equipment or systems. Therefore, this proposed amendment 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?

Response: No.

The proposed amendment is administrative. The TOC is not required by regulation to be in the TS. Removal does not impact any safety assumptions or have the potential to reduce a margin of safety. The proposed amendment involves a transfer of control of the TOC from the NRC to NextEra. No change in the technical content of the TS is involved. Consequently, transfer from the NRC to NextEra has no impact on the margin of safety. Therefore the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, NextEra has determined that operation of the facility in accordance with the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), in that it does 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.

4.4 Conclusions

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.

The Plant Operations Review Committee has reviewed this amendment and concurs with this conclusion.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

- (1) Technical Specifications Task Force, TSTF-GG-05-01, "Writer's Guide for Plant Specific Improved Technical Specifications," dated June 2005.
- (2) NRC letter to Calvert Cliffs Nuclear Power Plant Inc, Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 - "Amendment Re: Request to Remove the Table of Contents from the Technical Specifications, (TAC Nos. ME1336 and ME1337)," dated September 21, 2009. (ML092120042)
- (3) NRC letter to Nuclear Management Company, LLC, Monticello Nuclear Generating Plant - "Issuance of Amendment Re: Removal of the Table of Contents Out of the Technical Specifications, (TAC No. MD6027)," dated November 8, 2007. (ML072960159)

ENCLOSURE 2

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

**LICENSE AMENDMENT REQUEST 254
REMOVAL OF THE TABLE OF CONTENTS
FROM TECHNICAL SPECIFICATIONS**

TECHNICAL SPECIFICATION TABLE OF CONTENTS

3 pages follow

TABLE OF CONTENTS

1.0	USE AND APPLICATION	1.1-1
1.1	Definitions	1.1-1
1.2	Logical Connectors	1.2-1
1.3	Completion Times	1.3-1
1.4	Frequency	1.4-1
2.0	SAFETY LIMITS (SLs).....	2.0-1
2.1	SLs	2.0-1
2.2	SL Violations	2.0-1
3.0	LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY	3.0-1
3.0	SURVEILLANCE REQUIREMENT (SR) APPLICABILITY	3.0-4
3.1	REACTIVITY CONTROL SYSTEMS	3.1.1-1
3.1.1	SHUTDOWN MARGIN (SDM).....	3.1.1-1
3.1.2	Core Reactivity.....	3.1.2-1
3.1.3	Moderator Temperature Coefficient (MTC).....	3.1.3-1
3.1.4	Rod Group Alignment Limits.....	3.1.4-1
3.1.5	Shutdown Bank Insertion Limits	3.1.5-1
3.1.6	Control Bank Insertion Limits.....	3.1.6-1
3.1.7	Rod Position Indication	3.1.7-1
3.1.8	PHYSICS TESTS Exceptions-MODE 2	3.1.8-1
3.2	POWER DISTRIBUTION LIMITS	3.2.1-1
3.2.1	Heat Flux Hot Channel Factor ($F_Q(Z)$) (F_Q Methodology)	3.2.1-1
3.2.2	Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}^N$)	3.2.2-1
3.2.3	AXIAL FLUX DIFFERENCE (AFD)	3.2.3-1
3.2.4	QUADRANT POWER TILT RATIO (QPTR).....	3.2.4-1
3.3	INSTRUMENTATION	3.3.1-1
3.3.1	Reactor Protection System (RPS) Instrumentation.....	3.3.1-1
3.3.2	Engineered Safety Feature Actuation System (ESFAS) Instrumentation	3.3.2-1
3.3.3	Post Accident Monitoring (PAM) Instrumentation	3.3.3-1
3.3.4	Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation	3.3.4-1
3.3.5	Control Room Emergency Filtration System (CREFS) Actuation Instrumentation.....	3.3.5-1
3.3.6	Boron Dilution Alarm	3.3.6-1
3.4	REACTOR COOLANT SYSTEM (RCS).....	3.4.1-1
3.4.1	RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits	3.4.1-1
3.4.2	RCS Minimum Temperature for Criticality.....	3.4.2-1
3.4.3	RCS Pressure and Temperature (P/T) Limits	3.4.3-1
3.4.4	RCS Loops - MODES 1 and 2.....	3.4.4-1

TABLE OF CONTENTS

3.4	REACTOR COOLANT SYSTEM (continued)	
3.4.5	RCS Loops - MODE 3	3.4.5-1
3.4.6	RCS Loops - MODE 4	3.4.6-1
3.4.7	RCS Loops - MODE 5, Loops Filled.....	3.4.7-1
3.4.8	RCS Loops - MODE 5, Loops Not Filled	3.4.8-1
3.4.9	Pressurizer	3.4.9-1
3.4.10	Pressurizer Safety Valves.....	3.4.10-1
3.4.11	Pressurizer Power Operated Relief Valves (PORVs).....	3.4.11-1
3.4.12	Low Temperature Overpressure Protection (LTOP)	3.4.12-1
3.4.13	RCS Operational LEAKAGE.....	3.4.13-1
3.4.14	RCS Pressure Isolation Valve (PIV) Leakage.....	3.4.14-1
3.4.15	RCS Leakage Detection Instrumentation.....	3.4.15-1
3.4.16	RCS Specific Activity	3.4.16-1
3.4.17	Steam Generator (SG) Tube Integrity	3.4.17-1
3.5	EMERGENCY CORE COOLING SYSTEMS (ECCS).....	3.5.1-1
3.5.1	Accumulators	3.5.1-1
3.5.2	ECCS-Operating	3.5.2-1
3.5.3	ECCS-Shutdown.....	3.5.3-1
3.5.4	Refueling Water Storage Tank (RWST).....	3.5.4-1
3.6	CONTAINMENT SYSTEMS	3.6.1-1
3.6.1	Containment.....	3.6.1-1
3.6.2	Containment Air Locks.....	3.6.2-1
3.6.3	Containment Isolation Valves	3.6.3-1
3.6.4	Containment Pressure	3.6.4-1
3.6.5	Containment Air Temperature	3.6.5-1
3.6.6	Containment Spray and Cooling Systems	3.6.6-1
3.6.7	Spray Additive System.....	3.6.7-1
3.7	PLANT SYSTEMS	3.7.1-1
3.7.1	Main Steam Safety Valves (MSSVs).....	3.7.1-1
3.7.2	Main Steam Isolation Valves (MSIVs) and Non-Return Check Valves	3.7.2-1
3.7.3	Main Feedwater Isolation	3.7.3-1
3.7.4	Atmospheric Dump Valve (ADV) Flowpaths	3.7.4-1
3.7.5	Auxiliary Feedwater (AFW) System	3.7.5-1
3.7.6	Condensate Storage Tank (CST).....	3.7.6-1
3.7.7	Component Cooling Water (CC) System	3.7.7-1
3.7.8	Service Water (SW) System.....	3.7.8-1
3.7.9	Control Room Emergency Filtration System (CREFS).....	3.7.9-1
3.7.10	Fuel Storage Pool Water Level.....	3.7.10-1
3.7.11	Fuel Storage Pool Boron Concentration.....	3.7.11-1
3.7.12	Spent Fuel Pool Storage.....	3.7.12-1
3.7.13	Secondary Specific Activity	3.7.13-1

TABLE OF CONTENTS

3.8	ELECTRICAL POWER SYSTEMS	3.8.1-1
3.8.1	AC Sources-Operating.....	3.8.1-1
3.8.2	AC Sources-Shutdown	3.8.2-1
3.8.3	Diesel Fuel Oil and Starting Air	3.8.3-1
3.8.4	DC Sources-Operating	3.8.4-1
3.8.5	DC Sources-Shutdown	3.8.5-1
3.8.6	Battery Cell Parameters.....	3.8.6-1
3.8.7	Inverters-Operating	3.8.7-1
3.8.8	Inverters-Shutdown.....	3.8.8-1
3.8.9	Distribution Systems-Operating.....	3.8.9-1
3.8.10	Distribution Systems-Shutdown.....	3.8.10-1
3.9	REFUELING OPERATIONS	3.9.1-1
3.9.1	Boron Concentration.....	3.9.1-1
3.9.2	Nuclear Instrumentation.....	3.9.2-1
3.9.3	Containment Penetrations	3.9.3-1
3.9.4	Residual Heat Removal (RHR) and Coolant Circulation-High Water Level.....	3.9.4-1
3.9.5	Residual Heat Removal (RHR) and Coolant Circulation-Low Water Level.....	3.9.5-1
3.9.6	Refueling Cavity Water Level	3.9.6-1
4.0	DESIGN FEATURES.....	4.0-1
4.1	Site Location	4.0-1
4.2	Reactor Core.....	4.0-1
4.3	Fuel Storage.....	4.0-2
5.0	ADMINISTRATIVE CONTROLS	5.1-1
5.1	Responsibility	5.1-1
5.2	Organization.....	5.2-1
5.3	Unit Staff Qualifications	5.3-1
5.4	Procedures.....	5.4-1
5.5	Programs and Manuals.....	5.5-1
5.6	Reporting Requirements.....	5.6-1
5.7	High Radiation Area.....	5.7-1