



June 29, 2012

NRC 2012-0051
10 CFR 50.54(q)(2)
10 CFR 50.47(b)(10)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

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

Response to Inspection Report 05000266/2012503 and 05000301/2012503
Emergency Preparedness Preliminary White Finding

Reference: U.S. Nuclear Regulatory Commission, Point Beach Nuclear Plant, Units 1 and 2
NRC Baseline Emergency Preparedness Biennial Exercise Inspection Report
05000266/2012503 and 05000301/2012503; Preliminary White Finding, dated
June 1, 2012 (ML12153A245)

The Nuclear Regulatory Commission (NRC) provided NextEra Energy Point Beach, LLC (NextEra) with the results of an inspection of the Emergency Preparedness Biennial Exercise conducted at the Point Beach Nuclear Plant (PBNP) during the week of April 16, 2012. (Reference)

The Reference concluded that NextEra did not develop and put into place guidelines for the choice of protective actions during an emergency that were consistent with Federal guidance. NextEra has completed a comprehensive root cause evaluation (RCE) and the results are consistent with those presented in the Reference. Therefore, NextEra concurs with the finding and does not request a Regulatory Conference. This result and NextEra's decision were conveyed to Mr. Skokowski, Mr. Holmberg and Mr. Jickling on June 11, 2012.

The Reference identified a cross-cutting aspect in the area of Human Performance, Resources, Documentation (H.2(c)). In reviewing and evaluating the definitions for the cross-cutting aspects in Manual Chapter 0310 of the NRC Inspection Manual, NextEra does not believe that this issue is related to maintaining procedures. Based on the RCE, NextEra's findings support that the cross-cutting aspect is more appropriately categorized in the area of Human Performance, Decision Making, Systematic Process (H.1a).

The contributing cause in the RCE states that PBNP Emergency Planning did not perform comprehensive reviews of Federal guidance and operating experience or use a systematic process to ensure correct changes were made to the Protective Action Recommendations (PARs) section of the Emergency Plan Implementing Procedures. NextEra believes this contributing cause aligns with the cross-cutting aspect in H.1.a. Specifically, the site made changes to risk significant procedures without using a systematic process when revising the PARs. Accordingly, NextEra requests the NRC change the crosscutting aspect to H.1.a.

If you have any questions or require additional information, please contact Jerry Strharsky at 920/755-6557.

Very truly yours,

NextEra Energy Point Beach, LLC

A handwritten signature in black ink that reads "R. U. W. for L. Meyer". The signature is written in a cursive style with a large, stylized "W" and "M".

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
Branch Chief, Plant Support, Division of Reactor Safety, Region III, USNRC