



November 26, 2012

NRC 2012-0110
10 CFR 170

Chief Financial Officer (CFO)
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

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

Request for Fee Waiver as Pilot Plant for Closure Option 3 for GSI-191

Reference: (1) U.S. Nuclear Regulatory Commission, "Closure Options for Generic Safety Issue – 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance," Commission Paper SECY-12-0093, July 9, 2012 (ML121320270)

Closure Option 3 of Reference (1) recognizes that a different regulatory treatment for the containment sump and in-vessel effects may be warranted for resolving Generic Safety Issue (GSI) – 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance. Under Closure Option 3, suction strainer blockage is treated in a deterministic fashion while a risk-informed approach would evaluate in-vessel effects by considering the timing and potential mitigative actions associated with the event, rather than assuming worst-case conditions throughout.

The Point Beach Nuclear Plant (PBNP) two-loop Westinghouse Nuclear Steam Supply System (NSSS) design features, scope of insulation remediation, license bases simultaneous hot and cold leg injection, and an established probabilistic risk assessment model provide a solid platform for development of the technical bases and methods for an Option 3 closure approach.

NextEra Energy Point Beach, LLC (NextEra) will work closely with the Nuclear Regulatory Commission staff to determine the required licensing actions for this approach and for development of guidance for industry to follow.

NextEra requests that the review fees be waived for this application under the provisions of 10 CFR 170.11. NextEra understands that the fee waiver would extend to the entire review of applicable licensing submittals.

Provided a fee waiver is granted, NextEra would apply deterministic methods and would plan to complete all work related to the sump strainers by the third refueling outage after January 1, 2013 for each unit. All work related to in-vessel effects will be completed by the end of 2019.

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

If you have any questions, please contact Mr. Michael Millen, Licensing Manager, at 920/755-7845.

Very truly yours,

NextEra Energy Point Beach, LLC

A handwritten signature in black ink, appearing to read 'Larry Meyer', with a long horizontal line extending to the right.

Larry Meyer *For*
Site Vice President

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