



February 28, 2014

NRC 2014-0014  
10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

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

NextEra Energy Point Beach, LLC's Second Six Month Status Report in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

- References:
- (1) U.S. Nuclear Regulatory Commission, Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately), dated March 12, 2012 [ML12056A044]
  - (2) U.S. Nuclear Regulatory Commission, Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012 [ML12221A339]
  - (3) NEI 12-02, Revision 1, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,'" dated August, 2012 [ML12240A307]
  - (4) NextEra Energy Point Beach, LLC's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated October 26, 2012 [ML12305A200]
  - (5) NextEra Energy Point Beach, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 22, 2013 [ML13053A399]
  - (6) NRC Electronic Mail to NextEra Energy Point Beach, LLC, Point Beach Nuclear Plant, Units 1 and 2 - Draft Requests for Additional Information re: Integrated Plan for Reliable SFP Instrumentation (Order No. EA-12-051) (TAC Nos. MF0729 and MF0730), dated May 29, 2013 [ML13154A166]
  - (7) NextEra Energy Point Beach, LLC, Response to Request for Additional Information Regarding Overall Integrated Plan in Response to Order EA-12-051, Reliable Spent Fuel Pool Instrumentation, dated July 3, 2013 [ML13186A012]
  - (8) NRC Electronic Mail to NextEra Energy Point Beach, LLC, Point Beach Nuclear Plant, Units 1 and 2 – Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0729 and MF0730), dated November 18, 2013 [ML13309A011]

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to NextEra Energy Point Beach, LLC (NextEra). Reference 1 was immediately effective and directs NextEra to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the NextEra initial status report regarding mitigation strategies. Reference 5 provided the NextEra Overall Integrated Plan.


Reference 1 requires submission of a status report at six month intervals following submittal of the Overall Integrated Plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the second six month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. Enclosure 1 provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Mr. Mike Millen, Licensing Manager, at 920/755-7845.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on February 28, 2014.

Very truly yours,

NextEra Energy Point Beach, LLC

  
Eric McCartney  
Site Vice President

Enclosure

cc: Director, Office of Nuclear Reactor Regulation  
Administrator, Region III, USNRC  
Resident Inspector, Point Beach Nuclear Plant, USNRC  
Project Manager, Point Beach Nuclear Plant, USNRC  
Ms. Lisa M. Regner, NRR/JLD/PMB, USNRC  
Mr. Blake A. Purnell, NRR/JLD/PMB, USNRC  
Mr. Steven R. Jones, NRR/DSS/SBPB, USNRC

## ENCLOSURE

### NEXTERA ENERGY POINT BEACH, LLC POINT BEACH NUCLEAR PLANT

#### SECOND SIX MONTH STATUS REPORT IN RESPONSE TO MARCH 12, 2012 COMMISSION ORDER TO MODIFY LICENSES WITH REGARD TO RELIABLE SPENT FUEL POOL INSTRUMENTATION (ORDER NUMBER EA-12-051)

### 1. Introduction

NextEra Energy Point Beach, LLC (Point Beach), developed an Overall Integrated Plan (Reference 1) documenting the modification with regard to reliable Spent Fuel Pool (SFP) instrumentation in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

### 2. Milestone Accomplishments

Point Beach has selected and entered into a purchase agreement to procure SFP level instruments that, when installed, will meet all the criteria designated in the Overall Integrated Plan submitted on February 22, 2013 (Reference 1).

### 3. Milestone Schedule Status

The Milestone Schedule initially provided in the Overall Integrated Plan (Reference 1, Attachment 2) has been changed due to vendor design issues. These changes will not affect the ability to implement the Order as scheduled.

The initial milestones submitted were:

#### Units 1 and 2 Shared SFP

- |  |             |
|--|-------------|
| • Commence Engineering and Design              | In Progress |
| • Complete Design                              | 4Q 2013     |
| • Complete Procurement of SFP Instruments      | 4Q 2013     |
| • Complete Installation of SFP Instruments     | 3Q 2014     |
| • Instruments Operation and Training Completed | 3Q 2014     |

The revised milestones are:

#### Units 1 and 2 Shared SFP

- |  |  |
|--|--|
| • Commence Engineering and Design              | In Progress                            |
| • Complete Design                              | 2Q 2014                                |
| • Complete Procurement of SFP Instruments      | 3Q 2014                                |
| • Complete Installation of SFP Instruments     | 4Q 2014, Unit 1 Refueling<br>Outage 35 |
| • Instruments Operation and Training Completed | 4Q 2014, Unit 1 Refueling<br>Outage 35 |

Required implementation date:

- Point Beach Units 1 and 2

Unit 1 Refueling Outage 35  
4Q 2014

#### 4. Changes to Compliance Method

There currently are no changes to the compliance method documented in the Overall Integrated Plan (Reference 1). Consistent with the requirements of Order EA-12-051 and the Order guidance documents, the six month reports will delineate any proposed changes to compliance methods.

#### 5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

Point Beach is not requesting relief from the requirements of Order EA-12-051 (Reference 2) or guidance document JLD-ISG-2012-03 (Reference 4) at this time.

Consistent with the requirements of Order EA-12-051 (Reference 2) and the guidance in NEI 12-02 (Reference 5), the six month reports will delineate progress made, any proposed changes in compliance methods, updates to the schedule, and if needed, requests for relief and their bases.

#### 6. Requests for Additional Information

An Interim Staff Evaluation (ISE) with Requests for Additional Information (RAI) was received on November 18, 2013. (Reference 8)

The following table provides a summary of the status of Requests for Additional Information received on November 18, 2013. (Reference 8)

RAI	Status
RAI – 1 a, b, c	In progress
RAI - 2	In progress
RAI – 3	In progress
RAI – 4 a, b, c	In progress
RAI-5	In progress
RAI-6	In progress
RAI-7	In progress
RAI-8 a, b	In progress
RAI-9 a, b, c, d	In progress
RAI-10	In progress
RAI – 11	Response provided below
RAI – 12 a, b, c	Response provided below
RAI – 13	In progress

The response to the RAIs showing “in progress” in the table above requires design information that is not available at this time. As part of the ISE, the staff requested all information be provided by March 31, 2014. Due to delays in design and testing of the selected SFP level instrument, all the requested information may not be available by this date. If required, Point

Beach will work with the staff to determine a date when all requested information will be provided.

The following RAI responses are included:

**RAI-11**

*Please provide a list of the procedures addressing operation (both normal and abnormal response), calibration, test, maintenance, and inspection that will be developed for use of the SFP instrumentation. Include a brief description of the specific technical objectives to be achieved within each procedure.*

**NextEra Response RAI-11**

The modification review process will be used to ensure all necessary procedures are developed for maintaining and operating the spent fuel level instruments after installation. These procedures will be developed in accordance with NextEra procedural controls.

The objectives of each procedural area are described below:

Inspection, Calibration, and Testing - Guidance on the performance of periodic visual inspections, as well as intrusive testing, to ensure that each SFP channel is operating and indicating level within its design accuracy.

Preventative Maintenance - Guidance on scheduling of, and performing, appropriate preventative maintenance activities necessary to maintain the instruments in a reliable condition.

Maintenance - To specify troubleshooting and repair activities necessary to address system malfunctions.

Programmatic controls - Guidance on actions to be taken if one or more channels is out of service.

System Operations - To provide instructions for operation and use of the system by plant staff

Response to inadequate levels - Action to be taken on observations of levels below normal level will be addressed in Site off normal procedures and /or FLEX Support Guidelines.

**RAI-12**

*Please provide the following:*

- a) *Further information describing the maintenance and testing program the licensee will establish and implement to ensure that regular testing and calibration is performed and verified by inspection and audit to ensure conformance with design and system readiness requirements. Include a description of plans to ensure necessary channel checks, functional tests, periodic calibration and maintenance will be conducted for the level measurement system and its supporting equipment.*
- b) *A description of the guidance in NEI 12-02 section 4.3 on compensatory actions for one or both non-functioning channels will be addressed.*
- c) *A description of the planned compensatory actions to be taken in the event one of the instrument channels cannot be restored to functional status within 90 days.*

**NextEra Response RAI-12**

- a) SFP instrumentation channel/equipment maintenance/preventative maintenance and testing program requirements to ensure design and system readiness are planned to be established in accordance with Point Beach processes and procedures and in consideration of vendor recommendations to ensure that appropriate regular testing, channel checks, functional tests, periodic calibration and maintenance is performed (and available for inspection and audit). Subject maintenance and testing program requirements are planned to be developed during the SFP instrumentation modification design process.
- b) Both primary and backup SFP instrumentation channels incorporate permanent installation (with no reliance on portable, post-event installation) of relatively simple and robust augmented quality equipment. Permanent installation coupled with stocking of adequate spare parts reasonably diminishes the likelihood that a single channel (and greatly diminishes the likelihood that both channels) is (are) out-of-service for an extended period of time. Planned compensatory actions for unlikely extended out-of-service events are summarized as follows:

# Channel(s) Out-of-service	Required Restoration Action	Compensatory action
1	Initiate actions to restore channel to functional status within 90 days.	Initiate actions in accordance with Note 1.
2	Initiate action to restore at least one channel to functional status within 24 hours.	Initiate compensatory actions for monitoring Spent Fuel Pool level within 72 hours. (Note 2)

Note 1: Initiate an evaluation in accordance with the corrective action program. The evaluation shall determine compensatory actions if a second channel becomes inoperable. The evaluation shall include a planned schedule for restoring the instrument channel(s) to functional status.

Note 2: Initiate an evaluation in accordance with the corrective action program. The evaluation shall document compensatory actions taken or planned to be taken to implement an alternate method of monitoring and schedule required actions for restoring the instrumentation channel(s) to functional status.

- c) See RAI-12b response above.

## 7. References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. NextEra Energy Point Beach, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 22, 2013 [ML13053A399]
2. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 [ML12056A044]
3. NextEra Energy Point Beach, LLC's Response to Request for Additional Information Regarding Overall Integrated Plan in Response to Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation", dated July 3, 2013 [ML13186A012]
4. JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012 [ML12221A339]
5. NEI 12-02, Revision 1, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation'", dated August, 2012 [ML12240A307]
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