UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 27, 2015

Mr. Eric McCartney
Site Vice President
NextEra Energy Point Beach, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TECHNICAL SPECIFICATIONS TASK FORCE - 523, "GENERIC LETTER 2008-01, MANAGING GAS ACCUMULATION" (TAC NOS. MF4353 & MF4354)

Dear Mr. McCartney:

The U.S. Nuclear Regulatory Commission (NRC) has issued the enclosed Amendment Nos. 251 and 255 to Renewed Facility Operating License Nos. DPR-24 and DPR-27 for the Point Beach Nuclear Plant Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated July 2, 2014.

These amendments revise Surveillance Requirements to verify that the system locations susceptible to gas accumulation are sufficiently filled with water and to provide allowances which permit performance of the verification. The changes address the concerns discussed in NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" as described in NRC-approved Technical Specifications Task Force – 523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

Chawla

Mahesh L. Chawla, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosures:
1. Amendment No. 251 to DPR-24
2. Amendment No. 255 to DPR-27
3. Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NEXTERA ENERGY POINT BEACH, LLC

DOCKET NO. 50-266

POINT BEACH NUCLEAR PLANT, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 251
License No. DPR-24

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by NextEra Energy Point Beach, LLC (the licensee), dated July 2, 2014, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 4.B of the Renewed Facility Operating License No. DPR-24 is hereby amended to read as follows:

   2. Technical Specifications

      The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 251, are hereby incorporated in the renewed operating license. NextEra Energy Point Beach shall operate the facility in accordance with Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

David L. Pelton, Chief
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications and
Renewed Facility Operating License

Date of issuance: January 27, 2015

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NEXTERA ENERGY POINT BEACH, LLC

DOCKET NO. 50-301

POINT BEACH NUCLEAR PLANT, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 255
License No. DPR-27

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by NextEra Energy Point Beach, LLC (the licensee), dated July 2, 2014, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 4.B of the Renewed Facility Operating License No. DPR-27 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 255, are hereby incorporated in the renewed operating license. NextEra Point Beach shall operate the facility in accordance with Technical Specifications.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

David L. Pelton, Chief
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications and
Renewed Facility Operating License

Date of issuance: January 27, 2015

ATTACHMENT TO LICENSE AMENDMENT NO. 251

TO RENEWED FACILITY OPERATING LICENSE NO. DPR-24

AND LICENSE AMENDMENT NO. 255

TO RENEWED FACILITY OPERATING LICENSE NO. DPR-27

DOCKET NOS. 50-266 AND 50-301

Replace the following pages of Renewed Facility Operating License Nos. DPR-24 and DPR-27, and Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License

REMOVE	INSERT
-3-	-3-

Technical Specifications

REMOVE	INSERT
3.4.6-2	3.4.6-2
---	3.4.6-3
3.4.7-3	3.4.7-3
3.4.8-2	3.4.8-2
3.5.2-1	3.5.2-1
3.5.2-2	3.5.2-2
3.6.6-2	3.6.6-2
3.6.6-3	3.6.6-3
3.9.4-2	3.9.4-2
3.9.5-2	3.9.5-2

D. Pursuant to the Act and 10 CFR Parts 30, 40 and 70, NextEra Energy Point Beach to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

E. Pursuant to the Act and 10 CFR Parts 30 and 70, NextEra Energy Point Beach to possess such byproduct and special nuclear materials as may be produced by the operation of the facility, but not to separate such materials retained within the fuel cladding.

4. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Sections 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

A. Maximum Power Levels

NextEra Energy Point Beach is authorized to operate the facility at reactor core power levels not in excess of 1800 megawatts thermal.

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 251, are hereby incorporated in the renewed operating license. NextEra Energy Point Beach shall operate the facility in accordance with Technical Specifications.

C. Spent Fuel Pool Modification

The licensee is authorized to modify the spent fuel storage pool to increase its storage capacity from 351 to 1502 assemblies as described in licensee's application dated March 21, 1978, as supplemented and amended. In the event that the on-site verification check for poison material in the poison assemblies discloses any missing boron plates, the NRC shall be notified and an on-site test on every poison assembly shall be performed.

C. Pursuant to the Act and 10 CFR Parts 30, 40 and 70, NextEra Energy Point Beach to receive, possess and use at any time any byproduct, source, and special nuclear material as sealed neutron sources for reactor startup, sealed source for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

D. Pursuant to the Act and 10 CFR Parts 30, 40 and 70, NextEra Energy Point Beach to receive, possess and use in amounts as required any byproduct, source of special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

E. Pursuant to the Act and 10 CFR Parts 30 and 70, NextEra Energy Point Beach to possess such byproduct and special nuclear materials as may be produced by the operation of the facility, but not to separate such materials retained within the fuel cladding.

4. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Sections 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

A. Maximum Power Levels

NextEra Energy Point Beach is authorized to operate the facility at reactor core power levels not in excess of 1800 megawatts thermal.

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 255, are hereby incorporated in the renewed operating license. NextEra Energy Point Beach shall operate the facility in accordance with Technical Specifications.

C. Spent Fuel Pool Modification

The licensee is authorized to modify the spent fuel storage pool to increase its storage capacity from 351 to 1502 assemblies as described in licensee=s application dated March 21, 1978, as supplemented and amended. In the event that the on-site verification check for poison material in the poison assemblies discloses any missing boron plates, the NRC shall be notified and an on-site test on every poison assembly shall be performed.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One required RHR loop inoperable. AND Two required RCS loops inoperable.	B.1 Be in MODE 5.	24 hours
C. Required RCS or RHR loops inoperable. OR No RCS or RHR loop in operation.	C.1 Suspend all operations involving a reduction of RCS boron concentration. AND C.2 Initiate action to restore one loop to OPERABLE status and operation.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.6.1	Verify one RHR or RCS loop is in operation.	12 hours
SR 3.4.6.2	Verify SG secondary side water levels are ≥ 35% narrow range for required RCS loops.	12 hours
SR 3.4.6.3	Verify correct breaker alignment and indicated power are available to the required pump that is not in operation.	7 days

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.6.4	----------NOTE---------- Not required to be performed until 12 hours after entering MODE 4. ----------	
	Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	31 days

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.7.3	Verify correct breaker alignment and indicated power are available to the required RHR pump that is not in operation.	7 days
SR 3.4.7.4	Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	31 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required RHR loops inoperable. OR No RHR loop in operation.	B.1 Suspend all operations involving reduction in RCS boron concentration. AND B.2 Initiate action to restore one RHR loop to OPERABLE status and operation.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.8.1	Verify one RHR loop is in operation.	12 hours
SR 3.4.8.2	Verify correct breaker alignment and indicated power are available to the required RHR pump that is not in operation.	7 days
SR 3.4.8.3	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	31 days

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.2 ECCS – Operating

LCO 3.5.2 Two ECCS trains shall be OPERABLE.

---NOTE---
In MODE 3, both safety injection (SI) pump flow paths may be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14.1.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One ECCS train inoperable.	A.1 Restore train to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	---NOTE--- Not required to be met for system vent flow paths opened under administrative controls. --- Verify each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	31 days

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.2	Verify ECCS locations susceptible to gas accumulation are sufficiently filled with water.	31 days
SR 3.5.2.3	Verify each ECCS pump's developed head at the test flow point is greater than or equal to the required developed head.	In accordance with the Inservice Testing Program
SR 3.5.2.4	Verify each ECCS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	18 months
SR 3.5.2.5	Verify each ECCS pump starts automatically on an actual or simulated actuation signal.	18 months
SR 3.5.2.6	Verify, by visual inspection, each ECCS train containment sump suction inlet is not restricted by debris and the suction inlet debris screens show no evidence of structural distress or abnormal corrosion.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One required accident fan cooler unit service water outlet valve inoperable.	D.1 Restore required accident fan cooler unit outlet valve to OPERABLE status.	72 hours AND 144 hours from discovery of failure to meet the LCO
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Be in MODE 3. AND E.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.6.1	----------NOTE---------- Not required to be met for system vent flow paths opened under administrative controls. ---------- Verify each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	31 days
SR 3.6.6.2	Operate each containment cooling accident fan.	31 days

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.6.3	Verify each containment fan cooler unit can achieve a cooling water flow rate within design limits with a fan cooler service water outlet valve open.	31 days
SR 3.6.6.4	Verify each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head.	In accordance with the Inservice Testing Program
SR 3.6.6.5	Verify each automatic containment spray and containment fan cooler unit service water outlet valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	18 months
SR 3.6.6.6	Verify each containment spray pump starts automatically on an actual or simulated actuation signal.	18 months
SR 3.6.6.7	Verify each containment fan cooler unit accident fan starts automatically on an actual or simulated actuation signal.	18 months
SR 3.6.6.8	Verify proper operation of the accident fan cooler unit backdraft dampers.	18 months
SR 3.6.6.9	Verify each spray nozzle is unobstructed.	10 years
SR 3.6.6.10	Verify containment spray locations susceptible to gas accumulation are sufficiently filled with water.	31 days

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.4.1	Verify one RHR loop is in operation.	12 hours
SR 3.9.4.2	Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	31 days

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.5.1	Verify one RHR loop is in operation.	12 hours
SR 3.9.5.2	Verify correct breaker alignment and indicated power available to the required RHR pump that is not in operation.	7 days
SR 3.9.5.3	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	31 days

UNITED STATES
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 251 AND 255

TO RENEWED FACILITY OPERATING LICENSE NOS. DPR-24 AND DPR-27

NEXTERA ENERGY POINT BEACH, LLC

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-266 AND 50-301

1.0 INTRODUCTION

By letter dated July 2, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14183A944), NextEra Energy Point Beach, LLC (the licensee) requested changes to the technical specifications (TSs) for Point Beach Nuclear Plant Units 1 and 2 (Point Beach). Specifically, the licensee requested to adopt U.S. Nuclear Regulatory Commission (NRC)-approved Technical Specifications Task Force (TSTF) Standard Technical Specifications (STS) Change Traveler TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation" (ADAMS Accession No. ML13053A075), dated February 21, 2013.

The proposed change would revise Surveillance Requirements (SRs) related to gas accumulation for the emergency core cooling system (ECCS). The proposed change would also add new SRs related to gas accumulation for the residual heat removal (RHR), shutdown cooling (SDC), and containment spray (CS) systems. The TS Bases changes associated with these SRs would also be made.

The licensee stated that the license amendment request (LAR) is consistent with NRC-approved Traveler TSTF-523. The availability of this TS improvement was announced in the *Federal Register* on January 15, 2014 (79 FR 2700), as part of the consolidated line item improvement process (CLIIP).

2.0 REGULATORY EVALUATION

2.1 Background

Gas accumulation in reactor systems can result in water hammer, pump cavitation, and pumping of non-condensable gas into the reactor vessel. These effects may result in the subject system being unable to perform its specified safety function. The NRC issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat

Removal, and Containment Spray Systems," in January 2008 to address the issue of gas accumulation in ECCS, Decay Heat Removal (DHR), and CS systems (ADAMS Accession No. ML072910759). The industry and NRC staff agreed that a change to the STS and plant-specific TSs would be necessary to address some issues discussed in GL 2008-01. The TSTF-523 contains changes to the TS SRs and TS bases to address some of the concerns in GL 2008-01. The licensee proposed amending the Point Beach TSs using a plant-specific adoption of the TSTF-523 changes.

2.2 Technical Specification Changes

Changes were proposed for SRs 3.5.2.1, 3.5.2.2, and 3.6.6.1, as well as the addition of new SRs 3.4.6.4, 3.4.7.4, 3.4.8.3, 3.6.6.10, 3.9.4.2, and 3.9.5.3 to TS 3.4.6, "RCS Loops - MODE 4," TS 3.4.7, "RCS Loops - MODE 5, Loops Filled," TS 3.4.8, "RCS Loops - MODE 5, Loops Not Filled," TS 3.5.2, "ECCS – Operating," TS 3.6.6, "Containment Spray and Cooling Systems," TS 3.9.4, "RHR and Coolant Circulation – High Water Level," and TS 3.9.5, "RHR and Coolant Circulation – Low Water Level," respectively. Associated bases changes were proposed for the respective LCOs, SR changes, and SR additions. Bases changes for TS 3.5.3, "ECCS - Shutdown" were also proposed because they reference the SRs and bases of TS 3.5.2.

2.3 Regulatory Review

The regulations in Appendix A to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50 or similar plant-specific principal design criteria provide design requirements. Appendix B to 10 CFR Part 50, the TSs, and the licensee quality assurance programs provide operating requirements. The regulatory requirements of 10 CFR Part 50, Appendix A, that are applicable to gas management in the subject systems include: General Design Criteria (GDC) 1, 34, 35, 36, 37, 38, 39 and 40. GDC 1 requires that the subject systems be designed, fabricated, erected, and tested to quality standards. GDC 34 requires an RHR system designed to maintain specified acceptable fuel design limits and to meet design conditions that are not exceeded if a single failure occurs and specified electrical power systems fail. GDCs 35, 36, and 37 require an ECCS design that meets performance, inspection, and testing requirements. Additionally, the regulations in 10 CFR 50.46 provide specified ECCS performance criteria. GDCs 38, 39, and 40 require a containment heat removal system design that meets performance, inspection, and testing requirements.

Point Beach was not licensed to the 10 CFR 50, Appendix A, GDCs. The Point Beach design criteria are discussed in the Updated Final Safety Analysis Report (UFSAR) Section 1.3, "General Design Criteria." The Point Beach design criteria that equates to GDC 1 are addressed in UFSAR Section 1.3.1, "Overall Requirements (GDC 1 – GDC 5) and the design criteria that equates to GDC 34 through GDC 40 are addressed in UFSAR Section 1.3.7, "Engineered Safety Features (GDC 37 – GDC 65)." These differences do not alter the conclusion that the proposed change is applicable to Point Beach.

Quality assurance criteria provided in 10 CFR Part 50, Appendix B, that apply to gas management in the subject systems include: Criteria III, V, XI, XVI, and XVII. Criteria III and V require measures to ensure that applicable regulatory requirements and the design basis, as defined in 10 CFR 50.2, "Definitions," and as specified in the license application, are correctly translated into controlled specifications, drawings, procedures, and instructions. Criterion XI

requires a test program to ensure that the subject systems will perform satisfactorily in service and requires that test results shall be documented and evaluated to ensure that test requirements have been satisfied. Criterion XVI requires measures to ensure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances, are promptly identified and corrected, and that significant conditions adverse to quality are documented and reported to management. Criterion XVII requires maintenance of records of activities affecting quality.

The NRC's regulatory requirements related to the content of the TSs are contained in 10 CFR 50.36(c). The regulations at 10 CFR 50.36 require that the TSs include items in the following categories: (1) safety limits, limiting safety systems settings, and limiting control settings; (2) limiting conditions for operation (LCO); (3) SRs; (4) design features; and (5) administrative controls. SRs are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met. Typically, TS Section 5 requires that licensees establish, implement, and maintain written procedures covering the applicable procedures recommended in Appendix A to Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation)." Appendix A to RG 1.33 identifies instructions for filling and venting the ECCS and DHR system, as well as for draining and refilling heat exchangers. Standard TSs and most licensee TSs include SRs to verify that at least some of the subject systems piping is filled with water.

The NRC's guidance for the format and content of licensee TSs can be found in NUREG-1431, "Standard Technical Specifications Westinghouse Plants."

Regulatory guidance for the NRC staff's review of containment heat removal systems, ECCS, and RHR systems is provided in the following revisions and sections of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition" (SRP) during the review.

- Revision 5 of SRP, Section 6.2.2, "Containment Heat Removal Systems," dated March 2007 (ADAMS Accession No. ML070160661), provides the procedures concerning the review of containment heat removal under post-accident conditions to help ensure compliance with GDC 38, 39, and 40.

- Revision 3 of SRP, Section 6.3, "Emergency Core Cooling System," dated March 2007 (ADAMS Accession No. ML070550068), provides the procedures concerning the review of ECCS to help ensure compliance with GDC 35, 36, and 37.

- Revision 5 of SRP, Section 5.4.7, "Residual Heat Removal (RHR) System," dated May 2010 (ADAMS Accession Number ML100680577), provides the procedures concerning the review of RHR system as it is used to cool the reactor coolant system (RCS) during and following shutdown to help ensure compliance with GDC 34.

3.0 TECHNICAL EVALUATION

The NRC staff evaluated the licensee's proposed change against the applicable regulatory guidance in the STS, as modified by TSTF-523. The proposed change adopted the TS format

and content, to the extent practicable, contained in the changes made to NUREG-1431, "Standard Technical Specifications Westinghouse Plants" by TSTF-523. The NRC staff found that the proposed change is consistent with guidance in the STS, as modified by TSTF-523.

The NRC staff compared the proposed changes to the existing SRs, as well as the regulatory requirements of 10 CFR 50.36.

The licensee proposed the following TS changes:

(1) Add SR 3.4.6.4, which states, "Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water" with a note that states "Not required to be performed until 12 hours after entering MODE 4" and a frequency of 31 days.

(2) Add SR 3.4.7.4, which states, "Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water" with a frequency of 31 days.

(3) Add SR 3.4.8.3, which states "Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water" with a frequency of 31 days.

(4) Add a note to SR 3.5.2.1, which states, "Not required to be met for system vent flow paths opened under administrative controls."

(5) Revise the language for SR 3.5.2.2 from "Verify ECCS piping is full of water" to "Verify ECCS locations susceptible to gas accumulation are sufficiently filled with water."

(6) Add a note to SR 3.6.6.1, which states, "Not required to be met for system vent flow paths opened under administrative controls."

(7) Add SR 3.6.6.10, which states, "Verify containment spray locations susceptible to gas accumulation are sufficiently filled with water" with a frequency of 31 days.

(8) Add SR 3.9.4.2, which states, "Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water" with a frequency of 31 days.

(9) Add SR 3.9.5.3, which states, "Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water" with a frequency of 31 days.

(10) Add and revise the affected TS SR bases language to state the purpose of the SR, discuss methods of identifying locations susceptible to gas accumulation, discuss gas volume acceptance criteria, discuss methods for performing the SR, consistent with licensee actions and on-going programs related to GL 2008-01, and describe the SR frequency.

(11) Add and revise TS LCO bases language to describe what is required for Operability of the systems and reiterate the importance of gas management.

The new language for the SRs was developed using licensee responses to GL 2008-01 and the NRC discussion contained in Task Interface Agreement (TIA) 2008-03, "Emergency Core

Cooling System (ECCS) Voiding Relative To Compliance With Surveillance Requirements (SR) 3.5.1.1, 3.5.2.3, and 3.5.3.1" (ADAMS Accession No. ML082560209). Many of the GL 2008-01 responses stated that licensees identified system locations susceptible to gas accumulation. In the TIA, the NRC stated that the intent of the TS SRs, which state "full of water," may be met if the licensee can establish, through an Operability Determination, that there is a reasonable expectation that the system in question will perform its specified safety function. Therefore the phrase, "sufficiently filled with water" was recommended for the proposed TS changes. In the TS, "sufficiently filled with water" is understood to mean "sufficiently filled with water to support Operability." The regulation at 10 CFR 50.36(c)(3) states that one of the purposes of the SR is to verify that the LCO is met. Therefore, the new SR language, "Verify the [system name] locations susceptible to gas accumulation are sufficiently filled with water," is acceptable since this language will allow the licensee to make a conclusion as to whether or not a system is operable.

The language for the notes that state that the SR does not have to be performed until 12 hours after entering Mode 4 is acceptable because the note provides a limited time to perform the Surveillance after entering the Applicability of the LCO; however, under the STS usage rules (STS Section 1.4), the requirement to manage gas accumulation is not affected. Licensees must have confidence that the SR can be met or the LCO must be declared not met.
The language for the notes that allow the SRs to not be met for system vent flow paths opened under administrative controls is necessary to allow the licensee to credit administratively controlled manual action to close the system vent flow path in order to maintain system Operability during system venting and performance of the proposed gas accumulation SR. Therefore, these notes are acceptable.

The NRC staff found that the proposed SRs meet the regulatory requirements of 10 CFR 50.36 because they provide assurance that the necessary quality of systems and components will be maintained and that the LCOs will be met. Therefore, the NRC staff finds the proposed change acceptable.

The regulation at 10 CFR 50.36(a)(1) states, in part "A summary statement of the bases or reasons for such specifications ... shall also be included in the application, but shall not become part of the technical specifications." The licensee may make changes to the TS bases without prior NRC staff review and approval in accordance with the TS bases Control Program TS 5.5.13. Accordingly, along with the proposed TS changes, the licensee also submitted TS bases changes corresponding to the proposed TS changes. The NRC staff determined that TS Bases changes are consistent with the proposed TS changes and provide the purpose for each requirement in the specification consistent with the Commission's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors dated July 22, 1993 (58 FR 39132).

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Wisconsin State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously published a proposed finding that these amendments involve no significant hazards consideration, and there has been no public comment on such finding published November 12, 2014 (79 FR 67202). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Matthew E. Hamm, NRR/DSS/STSB

Date: January 27, 2015

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Mahesh L. Chawla, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosures:
1. Amendment No. 251 to DPR-24
2. Amendment No. 255 to DPR-27
3. Safety Evaluation

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