



March 19, 2015

NRC 2015-0018  
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  
License Nos. DPR-24 and DPR-27

Response to Request for Additional Information for Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program

- References:
- (1) NextEra Energy Point Beach, LLC, letter to NRC, dated July 3, 2014, "License Amendment Request 273, Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program" (ML14190A267)
  - (2) NRC Electronic Mail to NextEra Energy Point Beach, LLC, dated August 13, 2014, "Point Beach Nuclear Plant, Units 1 and 2 - Acceptance Review re: Risk-Informed Justification for Relocation of Specific TS Surveillance Frequencies (TAC NOS. MF4379 and MF4380)" (ML14226A011)
  - (3) NextEra Energy Point Beach, LLC, letter to NRC, dated December 8, 2014, "Supplement to License Amendment Request 273, Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program" (ML14342A416)
  - (4) NRC Electronic Mail to NextEra Energy Point Beach, LLC, dated February 27, 2015, "Request for Additional Information - Point Beach Nuclear Plant, Units 1 and 2 - LAR for TS Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program - TAC NOS.MF4379/80"

In Reference 1 and supplemented by Reference 3, NextEra Energy Point Beach, LLC (NextEra) submitted a request for an amendment to the Technical Specifications (TS) for Point Beach Nuclear Plant (PBNP), Units 1 and 2. The proposed amendment would modify the TS by relocating specific surveillance frequencies to a licensee-controlled document with

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implementation of Nuclear Energy Institute (NEI) 04-10, "Risk Informed Technical Specification Initiative 5b, Risk Informed Method for Control of Surveillance Frequencies."

In Reference 4, the NRC staff requested additional information to complete its review of the requested amendment. The enclosure provides the NextEra response to the NRC staff's request for additional information. The attachment to the enclosure provides a corrected markup of proposed TS 5.5.19, Surveillance Frequency Control Program, which supersedes the corresponding markup provided in Reference 1.

This letter contains no new regulatory commitments and no revisions to existing regulatory commitments.

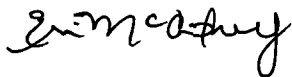
This response to the request for additional information does not alter the conclusion in Reference 1 that the proposed change does not involve a significant hazards consideration.

If you have any questions regarding this letter, please contact Mike Millen at (920) 755-7845.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 19, 2015.

Sincerely,



Eric McCartney  
Site Vice President  
Point Beach Nuclear Plant

Enclosure

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

**ENCLOSURE**

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

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
(APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING RISK -INFORMED  
JUSTIFICATIONS FOR THE RELOCATION OF SPECIFIC SURVEILLANCE FREQUENCY  
REQUIREMENTS TO A LICENSEE CONTROLLED PROGRAM)**

**RAI #1**

*Proposed TS 5.5.19 part c invokes provisions of surveillance requirements (SR) 4.0.2 and 4.0.3. These requirements cannot be located in the licensee's current TS. Please explain what SRs are being referred to.*

**NextEra Response**

The reference to surveillance requirements (SR) SR 4.0.2 and SR 4.0.3 is incorrect; the correct references are SR 3.0.2 and SR 3.0.3.

The attachment to this enclosure provides a revised markup of the Technical Specifications (TS) showing proposed TS 5.5.19, Surveillance Frequency Control Program, with reference to the correct SRs.

5.5 Programs and Manuals

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5.5.18 Control Room Envelope Habitability Program (continued)

- g. An adequate supply of self contained breathing apparatus (SCBA) units in the CRE to protect CRE occupants from a hazardous chemical release.
- h. Portable smoke ejection equipment per the Fire Protection Evaluation Report and Safe Shutdown Analysis Report to address a potential smoke challenge.

Insert TS 5.5.19



ATTACHMENT  
Markup of Technical Specification 5.5.19

**Insert TS 5.5.19**

**5.5.19 Surveillance Frequency Control Program**

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.