



November 6, 2015

NRC 2015-0069  
10 CFR 50.4

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  
Renewed License Nos. DPR-24 and DPR-27

Response to Request for Information Supporting Flooding Hazards Reevaluation Report Audit

- References:
- (1) NextEra Energy Point Beach, LLC, Response to NRC 10 CFR 50.54(f) Request for Information Regarding Near-Term Task Force Recommendation 2.1, Flooding – Submittal of Flooding Hazards Reevaluation Report, dated March 12, 2015
  - (2) Nuclear Regulatory Commission Plan for the Audit of NextEra Energy Point Beach, LLC's Flood Hazard Reevaluation Report Submittal Relating to the Near-Term Task Force Recommendation 2.1 – Flooding for Point Beach Nuclear Plant, Units 1 and 2 (TAC Nos. MF6100 and MF6101), dated June 4, 2015
  - (3) NextEra/NRC Teleconference Related to Point Beach Flooding Hazards Reevaluation Report on October 29, 2015

By letter dated March 12, 2015, NextEra Energy Point Beach, LLC (NextEra) submitted a Flooding Hazards Reevaluation Report (FHRR) (Reference 1) in response to Title 10 of the Code of Federal Regulations 50.54(f) Request for Information, relating to Recommendation 2.1. By letter dated June 4, 2015 (Reference 2), the NRC notified NextEra of upcoming audit activities related to review of the FHRR submittal. During a teleconference conducted on October 29, 2015 (Reference 3), NRC requested clarifications related to the NextEra FHRR submittal for Point Beach.

Enclosures 1 and 2 provide the requested information.

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

If you have any questions, please contact Mr. Bryan Woyak, Licensing Manager, at (920) 755-7599.

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Very truly yours,

NextEra Energy Point Beach, LLC



Eric McCartney  
Site Vice President

Enclosures

cc: Director, Office of Nuclear Reactor Regulation  
Administrator, Region III, USNRC  
Project Manager, Point Beach Nuclear Plant, USNRC  
Resident Inspector, Point Beach Nuclear Plant, USNRC  
Ms. Lisa M. Regner, NRR/JLD/PMB, USNRC  
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**ENCLOSURE 1**

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

**RESPONSE TO REQUEST FOR INFORMATION SUPPORTING  
FLOODING HAZARDS REEVALUATION REPORT AUDIT**

### **Clarification Request**

*Describe how the reevaluated flood hazards are compared to the Current Licensing Basis and the Current Design Basis.*

### **Response**

All of the subsections in Flooding Hazards Reevaluation Report (FHRR), Section 5, Comparison with Current Design Basis, compare the current design basis flood elevations to the reevaluated flood hazards at Point Beach Nuclear Plant (PBNP). For the postulated flooding events in the FHRR, PBNP does not differentiate between current design basis (CDB) and current licensing basis (CLB). CDB and CLB are considered synonymous in the FHRR for postulated flooding.

### **Clarification Request**

*Provide updated figures, where necessary, to accurately distinguish the locations and areal extents of temporary wave barriers. If possible, make door numbers more legible in FHRR Figure 4.5.*

### **Response**

FHRR, Figure 4.5, PBNP Door Locations, has been updated to improve the display of the door numbers. The updated figure is included in Enclosure 2.

FHRR, Figure 4.8, LIP [Local Intense Precipitation] Maximum Flow Depths – Scenario B, has been updated to more clearly show the wave/door barriers (wave run-up door barriers) at the Circulating Water Pumphouse. The updated figure is included in Enclosure 2.

### **Clarification Request**

*The FHRR states that the elevations of the grid cells to the east of the Turbine Building were manually set at 589.3 ft NAVD88 (+8ft -Plant Datum) for reasons of accurately determining flood elevations and model stability. Provide more information on the modification of the Digital Terrain Model to 589.3 ft NAVD88 (+8 ft-Plant Datum). Specifically, what was the original elevation and why was that elevation revised for accuracy and model stability?*

### **Response**

A supplemental figure, titled "Original Elevations East of Turbine Hall" is provided in Enclosure 2. The figure shows the unaltered elevation data for the area east of the Turbine Building. The elevation cells within the black outline were manually set to +8 ft-Plant Datum (+589.3 ft-NAVD88). The ground elevations in that area range from approximately +7.0 ft-Plant Datum to +8.4 ft-Plant Datum. Based on the construction drawings of the Turbine Building, the floor at the east end of the building (where Doors 1, 2, 4, 11 and 13 are located) are at an elevation of +8 ft-Plant Datum. The model cells adjacent to these doors, interpolated from site survey data, were at elevations other than +8 ft-Plant Datum originally. To properly represent the door elevations, all the cells within the black outline were manually adjusted to +8 ft-Plant Datum. Although the manual alteration of grid cell elevations changes the surface topography, it does so in a conservative manner. In most of the area, storage capacity was removed by increasing the cell elevation to +8 ft-Plant Datum, which would slightly increase the maximum Local Intense Precipitation water surface elevations.

### **Clarification Request**

*Section 5.1 of the FHRR states that “The FHR WSELs and maximum flow depths exceed the CLB at each POI.” Door 600 for the Diesel Generator Building is noted as 608.2ft NAVD88 in the CLB Table 3.1, which exceeds the 607.7ft NAVD88 recorded for Door 600 in the updated LIP analysis in Table 4.2. Door 601 has the same flow depth for the CLB and the updated LIP analysis. Clarify this data reported in Section 5.1.*

### **Response**

In FHRR, Section 5.1, Precipitation Flooding, the text should read “The FHR maximum flow depths exceed the CLB at each POI, with the exception of Door 601, which remained the same”, without comparison of the water surface elevations (WSELs).

The CLB runoff model was aligned with respect to North, whereas the FHRR runoff model was aligned with building edges with an approximately 25 degrees clockwise from North rotation. Accordingly, the topographic interpolation at certain model cells differed between the CLB and FHRR models (e.g., Door 600 ground elevation differed by 0.5 ft). Correspondingly, the water depth result in the cell adjacent to Door 600 is a better comparison of the CLB and FHRR values. For example, the maximum flow depth at Door 600 increased from <0.1 ft (‘N/A’ in FHRR, Table 3.1) to 0.2 ft (FHRR, Table 4.2). The maximum depth at Door 601 remained at 0.1 ft, although it should be noted that the FHRR water depth was slightly higher beyond the significant digits reported.

**ENCLOSURE 2**

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

**RESPONSE TO REQUEST FOR INFORMATION SUPPORTING  
FLOODING HAZARDS REEVALUATION REPORT AUDIT**

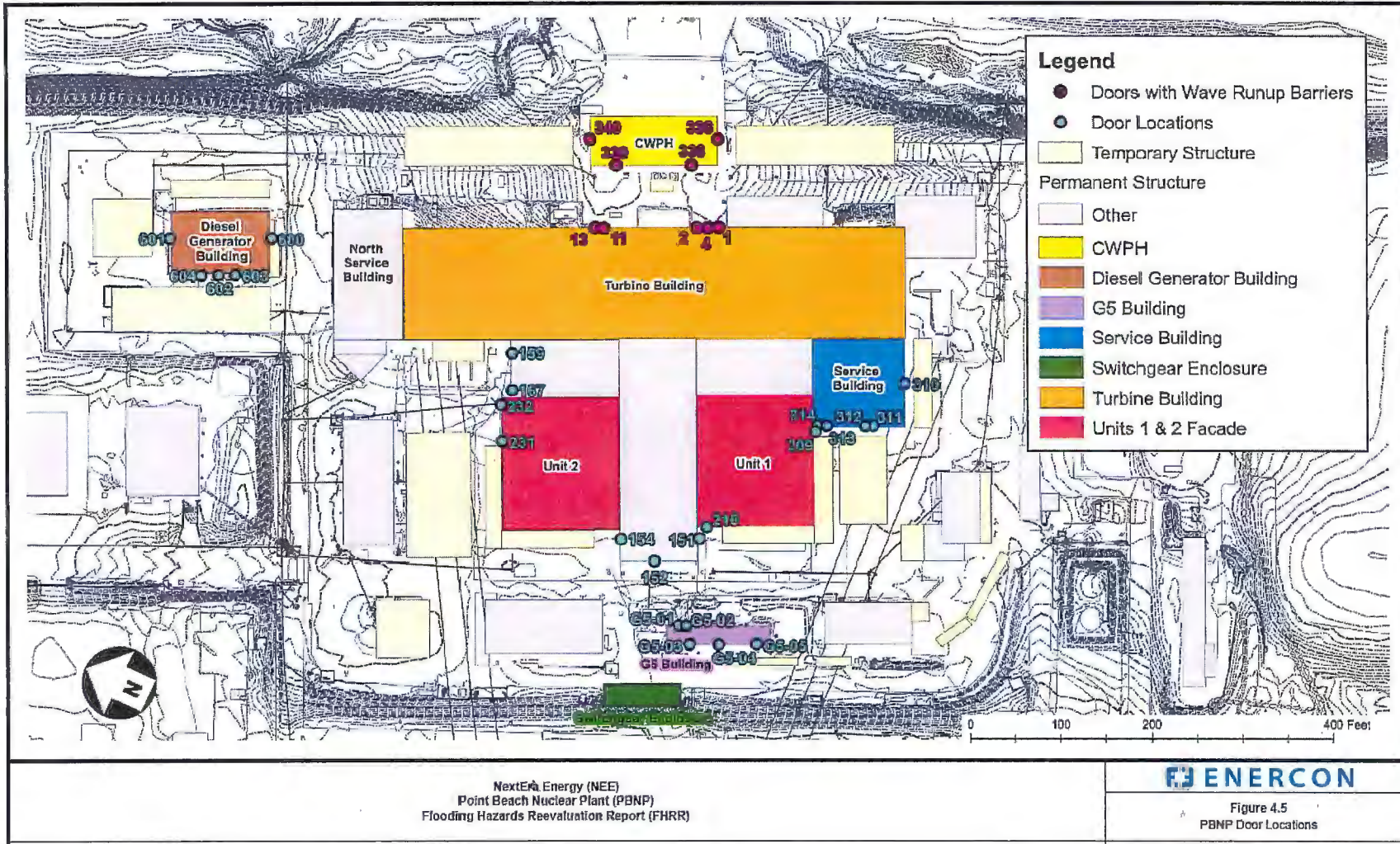
**REVISED FIGURES**

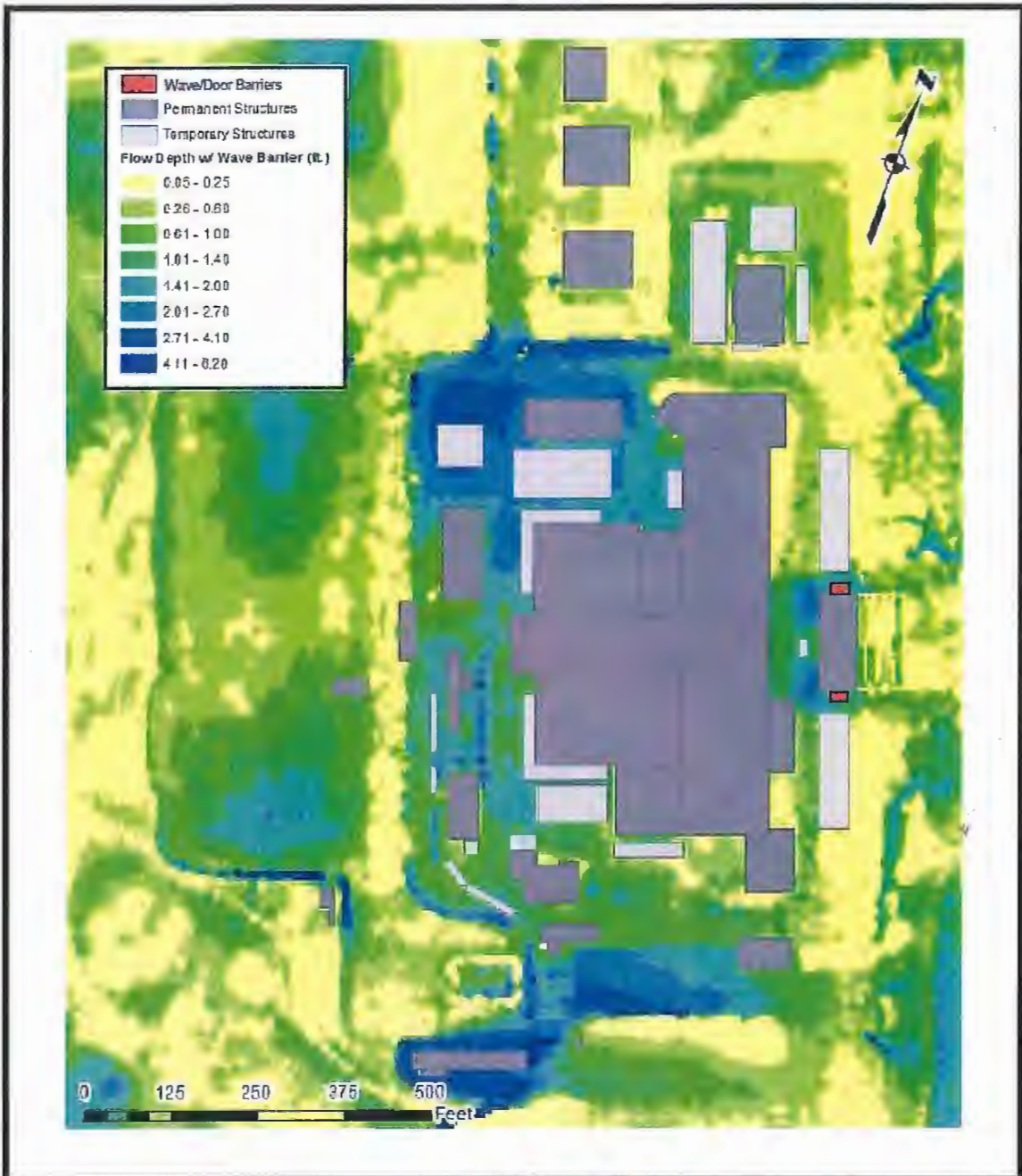
Figure 4.5, PBNP Door Locations

FHRR, Figure 4.8, LIP Maximum Flow Depths – Scenario B

Supplemental Figure – Original Elevations East of Turbine Hall

3 pages follow



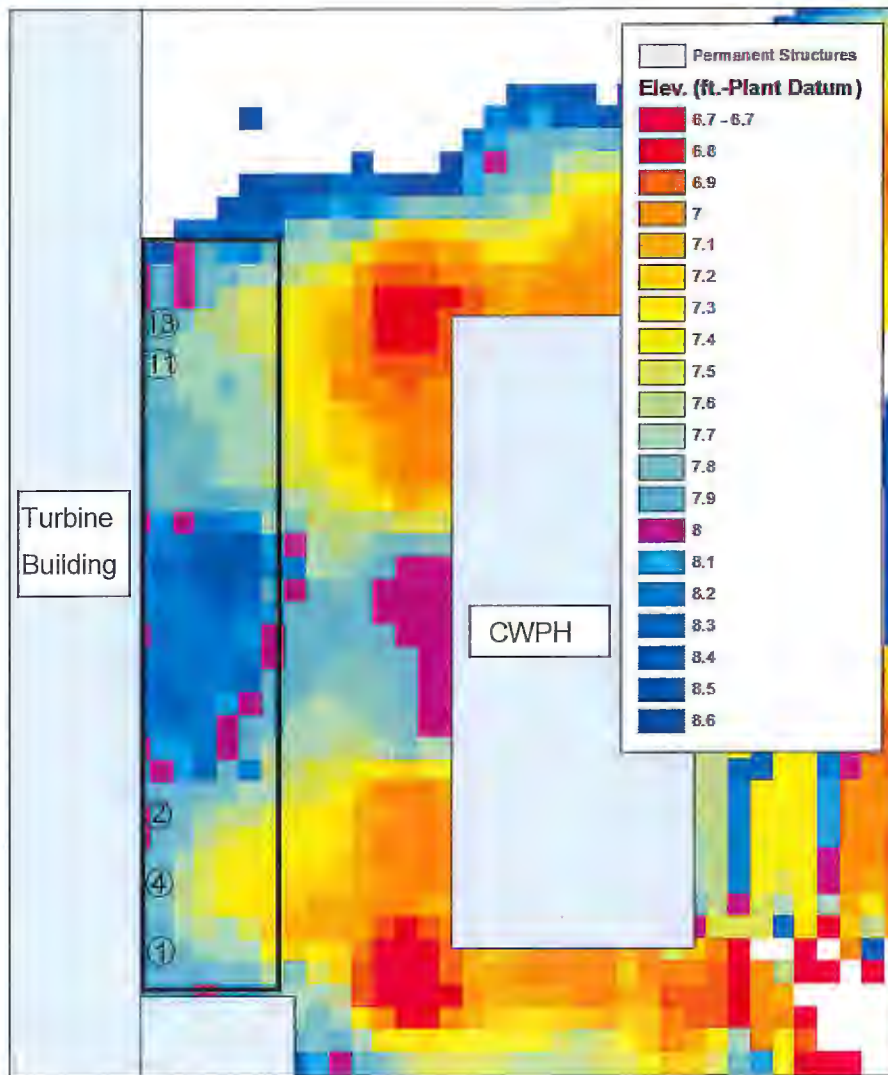


NextEra Energy (NEE)  
 Point Beach Nuclear Plant (PBNP)  
 Flooding Hazards Reevaluation Report (FHRR)



Figure 4.8  
 LIP Maximum Flow Depths – Scenario B





Original Elevations East of the Turbine Hall