



January 26, 2016

NRC 2016-0003  
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  
Renewed License Nos. DPR-24 and DPR-27

License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan Supplemental Response to Request for Additional Information #5

- References:
- (1) NextEra Energy Point Beach, LLC letter to NRC, dated June 12, 2015, License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan (ML15166A042)
  - (2) NRC electronic mail to NextEra Energy Point Beach, LLC, dated July 28, 2015, LIC - 109 Acceptance Review for Point Beach Nuclear Plant, Units 1 and 2 – License Amendment Request 277 to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan (MF6352/MF6353)
  - (3) NextEra Energy Point Beach, LLC letter to NRC, dated August 11, 2015, Request for Extension of LIC-109, Acceptance Review Opportunity to Supplement for License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan (ML15223B277)
  - (4) NextEra Energy Point Beach, LLC letter to NRC, dated August 28, 2015, Response to Request for Supplemental Information for License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan (ML15240A017)
  - (5) NRC letter to NextEra Energy Point Beach, LLC, dated September 14, 2015, Point Beach Nuclear Plant, Units 1 and 2 – Acceptance of Requested Licensing Action Re: Staff Augmentation Times (ML15247A347)
  - (6) NRC e-mail to NextEra Energy Point Beach, LLC, dated October 6, 2015, Request for Additional Information - Point Beach LAR 277 - Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan
  - (7) NextEra Energy Point Beach, LLC letter to NRC, dated November 20, 2015, License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan Response to Request for Additional Information (ML15328A481)

Pursuant to 10 CFR 50.90, NextEra Energy Point Beach, LLC, (NextEra) requested to amend Renewed Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant (PBNP), Units 1 and 2 (Reference 1 and supplemented via Reference 4). The NRC accepted the license amendment request for review as documented in Reference (5).

The NRC determined additional information was required to enable the staff's continued review of the PBNP Emergency Plan to increase the staff augmentation times for Emergency Response Organization (ERO) response functions (Reference 6). Reference (7) contains NextEra's response to this request. A revised response to the Request for Additional Information #5 is needed to describe a change to the proposed augmentation staffing of field monitoring teams. Enclosure 1 contains the revised response.

A second person is being added to each of the Field Monitoring Teams in EP 5.0, Table 5.1, "Minimum Staffing for Emergencies."

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

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on January 26, 2016.

Very truly yours,

NextEra Energy Point Beach, LLC



Eric McCartney  
Site Vice President

Enclosures

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

## ENCLOSURE 1

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

#### LICENSE AMENDMENT REQUEST 277, REVISION TO STAFF AUGMENTATION TIMES IN THE POINT BEACH NUCLEAR PLANT EMERGENCY PLAN SUPPLEMENTAL RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION #5

Pursuant to 10 CFR 50.90, NextEra Energy Point Beach, LLC, (NextEra) requested to amend Renewed Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant (PBNP), Units 1 and 2 (Reference 1 and supplemented via Reference 4). The NRC accepted the license amendment request for review as documented in Reference (5).

The NRC determined additional information was required to enable the staff's continued review of the PBNP Emergency Plan to increase the staff augmentation times for Emergency Response Organization (ERO) response functions (Reference 6). Reference (7) contains NextEra's response to this request. A revised response to the Request for Additional Information #5 is needed to describe a change to the proposed augmentation staffing of field monitoring teams.

#### **RAI-PBNP-5**

*Page 8 of 14 of the supplemental information (letter dated August 28, 2015 (ADAMS Accession Number ML15240A017) provides the following for the Offsite Surveys Major Task:*

*The current Emergency Plan maintains the one on-shift RP Technician as well as the 60 minute augmentation time at the Alert or higher classification for the offsite survey teams. The Dose/PAR Coordinator position, a 30 minute responder in the EOF is responsible for providing field monitoring team oversight in conjunction with the Offsite Radiation Protection Facility (OSRPF) Coordinator, a 60 minute responder in the OSRPF.*

*In the proposed Emergency Plan, the requirement for the on shift RP Technician is maintained as well as the 60 minute augmentation time at the Alert or higher classification for the offsite survey teams. The OSRPF Coordinator is also maintained as a 60 minute responder and would report to the Rad/Chem Coordinator in the TSC. The proposed Emergency Plan would extend the Rad/Chem Coordinator position response from 30 minutes to 60 minutes. The proposed revision does not impact the timing of the offsite survey major task which would be maintained at 60 minutes.*

*Table 5.1 on page 17 of 24 in Enclosure 1 to Attachment 1 of the original application provides: one (1) person assigned to Field Monitoring Team 1 and one (1) person assigned to Field Monitoring Team 2 augmenting at 60 minutes.*

*Letter dated February 18, 1982 (ADAMS Legacy Accession No. 8203030116), specifically Attachment 2, "Comparison of PBNP Augmentation to Table B-1 of NUREG-0654," provided for the major function of Offsite Surveys/On-site (Exclusion Area Surveys):*

*At variance (temporary). Table B-1 requires 3-30 min and 3-60 min. Nuclear Plant Specialist (Chem) and RadChem Techs will not be fully qualified until 12/31/82, at which time, 3 & 3 will be met.*

*Please explain how the proposed ERO maintains the commitment for offsite surveys as described in the February 18, 1982 letter cited above. Additionally, clarify how having one (1) 60 minute responder for each Field Monitoring Team meets the intent of EPIP 7.3.1, "Offsite Radiological Sampling and Surveys," as it states in step 5.1.1:*

*Each Field Monitoring Shall have a minimum of two persons.*

#### **Revised NextEra Response to RAI-PBNP-5**

The February 18, 1982, letter was one of many letters proposing interim actions intended to resolve interaction between the NRC and the site with respect to on-shift staffing and augmentation occurring between 1980 and when partially resolved by NRC Safety Evaluation Report in 1984. The letter included a number of interim actions intended to be performed until the site and the NRC could reach agreement with respect to composition of the ERO. A partial SER was issued by letter dated 4/29/83. Final resolution of the on-shift staffing and the inclusion of a goal of partial augmentation in 30 minutes were added in Revision 22 of EP 5.0 of the site Emergency Plan. This License Amendment Request (LAR), as further modified by this response, is intended to provide a new licensing basis for on-shift staffing in addition to augmented response.

The proposed ERO augmentation staffing to perform the offsite surveys is two field monitoring teams with direction provided by a field team leader. Each field monitoring team consists of two members. One member will perform the offsite field monitoring tasks and communication of results while the second team member will function as a driver and be available to provide support. The field monitoring team members and the field monitoring team leader respond within 60 minutes. EP 5.0 Table 5.1 has been revised to reflect this modification to the LAR as shown in Enclosure 2 Attachments 1 and 2.

## References

1. NextEra Energy Point Beach, LLC letter to NRC, dated June 12, 2015, License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan (ML15166A042)
2. NRC electronic mail to NextEra Energy Point Beach, LLC, dated July 28, 2015, LIC - 109 Acceptance Review for Point Beach Nuclear Plant, Units 1 and 2 – License Amendment Request 277 to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan (MF6352/MF6351)
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7. NextEra Energy Point Beach, LLC letter to NRC, dated November 20, 2015, License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan Response to Request for Additional Information (ML15328A481)

**ENCLOSURE 2, ATTACHMENT 1**

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

**LICENSE AMENDMENT REQUEST 277  
REVISION TO STAFF AUGMENTATION TIMES IN THE  
PBNP EMERGENCY PLAN**

**REVISION TO MARKED-UP COPY OF TABLE 5.1 OF EMERGENCY PLAN 5.0**

ORGANIZATIONAL CONTROL OF EMERGENCIES

8.0 BASES

B-1 PBNP Staffing Analysis performed and approved on 11/06/2013 (Rev 2) in accordance with NEI 10-05 (Rev 0), Assessment of On-Shift Emergency Response Organization Staffing Capabilities.

TABLE 5.1  
Minimum Staffing For Emergencies (B-1)

MAJOR FUNCTIONAL AREA	ON SHIFT STAFFING	
	POSITION/FUNCTION TITLE	Staffing
Plant Operations and Assessment of Operational Aspects	Shift Manager (SM)	1
	Operating Supervisor (OS)	2
	Control Operators (CO)	4
	Auxiliary Operators (AO)	
	(1 FBL + 2 FBM) (Note 1)	5
Notification/ Communications	Communicator	Note 2
	Security Shift Supervisor (SSS) (State and Local Notifications)	1
Support Staff	Radiochemistry Technician	1
	Dose Assessment	1
	Radiation Protection Technologist	+ 2
Fire Brigade	Additional FBMs and/or AOs (Note 1)	2
<b>TOTALS</b>		<b>18 20</b>

FBL – Fire Brigade Leader FBM – Fire Brigade Member  
 Note 1: Total staffing for AOs/FBMs is 7. This includes a minimum of 5 AOs plus 2 additional FBMs which may be AOs.  
 Note 2: This position may be filled by the OS, AO, or STA.

MAJOR FUNCTIONAL AREA	POSITION TITLE	AUGMENTATION STAFFING	
		30 60 MINUTES	60 90 MINUTES
Emergency Direction and Control	Emergency Director (EOF) (TSC)	1	±
	TSC Manager	1	
	EOF Manager		1
	Assistant EOF Manager		1
	EAL Monitor	1	
Plant System Engineering / Repair and Corrective Actions Protective Actions	Operations Coordinator	1	±
	Engineering Coordinator	±	±
	Reactor Engineer	1	
	Mechanical Engineer	1	
	Electrical Engineer	1	
	OSC Coordinator	1	±
	Rad/Chem Coordinator	1	
	Operations Leader (OSC)	1	±
	Radiation Protection Leader (OSC)	1	±
	Radiation Protection Technician (OSC)	4	
	I&C Leader (OSC)	±	1
	I&C Technician (OSC)		1
	Mechanical or Electrical Leader (OSC)	±	1
	Mechanical (OSC)	1	
	Electrical Leader (OSC)		1
	Electrician (OSC)	1	
	Chemistry Leader	1	
	Chemistry Radiochemistry Technician (OSC)	1	
	Resource Coordinator (EOF)		1
	Dose/PAR Coordinator (EOF)	±	1
	OSRPF Coordinator	1	±
	Field Team Leader	1	±
	Field Monitoring Team #1	2	±
Field Monitoring Team #2	2	±	
Communications	ERF Communicator (TSC)	1	±
	ERF Communicator (EOF)		1
	ENS Communicator (TSC)	1	±
	State/County Communicator (EOF)		1
<b>TOTALS</b>		<b>6 27</b>	<b>16 10</b>

**ENCLOSURE 2, ATTACHMENT 2**

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

**LICENSE AMENDMENT REQUEST 277  
REVISION TO STAFF AUGMENTATION TIMES IN THE  
PBNP EMERGENCY PLAN**

**REVISION TO CLEAN COPY OF TABLE 5.1 OF EMERGENCY PLAN 5.0**



ORGANIZATIONAL CONTROL OF EMERGENCIES

8.0 BASES

B-1 PBNP Staffing Analysis performed and approved on 11/06/2013 (Rev 2) in accordance with NEI 10-05 (Rev 0), Assessment of On-Shift Emergency Response Organization Staffing Capabilities.

TABLE 5.1  
Minimum Staffing For Emergencies (B-1)

MAJOR FUNCTIONAL AREA	ON SHIFT STAFFING	
	POSITION/FUNCTION TITLE	Staffing
Plant Operations and Assessment of Operational Aspects	Shift Manager (SM)	1
	Operating Supervisor (OS)	2
	Control Operators (CO)	4
	Auxiliary Operators (AO)	
	(1 FBL + 2 FBM) (Note 1)	5
Notification/ Communications	Communicator	Note 2
	Security Supervisor (State and Local Notifications)	1
Support Staff	Radiochemistry Technician	1
	Dose Assessment	1
	Radiation Protection Technologist	2
Fire Brigade	Additional FBMs and/or AOs (Note 1)	2
	<b>TOTALS</b>	<b>20</b>

FBL – Fire Brigade Leader FBM – Fire Brigade Member

Note 1: Total staffing for AOs/FBMs is 7. This includes a minimum of 5 AOs plus 2 additional FBMs which may be AOs.

Note 2: This position may be filled by the OS, AO, or STA.

MAJOR FUNCTIONAL AREA	POSITION TITLE	AUGMENTATION STAFFING	
		60 MINUTES	90 MINUTES
Emergency Direction and Control	Emergency Director (TSC)	1	
	TSC Manager	1	
	EOF Manager		1
	Assistant EOF Manager		1
	EAL Monitor	1	
Plant System Engineering / Repair and Corrective Actions Protective Actions	Operations Coordinator	1	
	Reactor Engineer	1	
	Mechanical Engineer	1	
	Electrical Engineer	1	
	OSC Coordinator	1	
	Rad/Chem Coordinator	1	
	Operations Leader (OSC)	1	
	Radiation Protection Leader (OSC)	1	
	Radiation Protection Technician (OSC)	4	
	I&C Leader (OSC)		1
	I&C Technician (OSC)		1
	Mechanical Leader (OSC)		1
	Mechanical (OSC)	1	
	Electrical Leader (OSC)		1
	Electrician (OSC)	1	
	Chemistry Leader	1	
	Radiochemistry Technician (OSC)	1	
	Resource Coordinator (EOF)		1
	Dose/PAR Coordinator (EOF)		1
	OSRPF Coordinator	1	
Field Team Leader	1		
Field Monitoring Team #1	2		
Field Monitoring Team #2	2		
Communications	ERF Communicator (TSC)	1	
	ERF Communicator (EOF)		1
	ENS Communicator (TSC)	1	
	State/County Communicator (EOF)		1
	<b>TOTALS</b>	<b>27</b>	<b>10</b>