



July 27, 2016

NRC 2016-0033
10 CFR 50.90

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

Point Beach Nuclear Plant
Units 1 and 2
Docket Nos. 50-266 and 50-301
Renewed Facility Operating Licenses Nos. DPR-24 and DPR-27

Response to Request for Additional Information - Point Beach Nuclear Plant, Units 1 & 2 -
License Amendment Request 279 –Elimination of Technical Specification Section 3.7.14 -
Primary Auxiliary Building Ventilation - MF7261/62

References:

- (1) NRC Electronic Mail to NextEra Energy Point Beach, dated June 27, 2016, "Request for Additional Information - License Amendment Request 279 –Elimination of Technical Specification Section 3.7.14 - Primary Auxiliary Building Ventilation" (MF7261/62)
- (2) NextEra Energy Point Beach letter (NRC 2015-0075) to NRC dated January 15, 2016, "License Amendment Request 279, Elimination of Technical Specification 3.7.14, Primary Auxiliary Building Ventilation" (ML16015A112)
- (3) NextEra Energy Point Beach letter (NRC 2016-0018) to NRC dated April 27, 2016, "License Amendment Request 279, Elimination of Technical Specification 3.7.14, Primary Auxiliary Building Ventilation" (ML16118A316)

The NRC staff determined in Reference (1) that additional information was required to complete its review of the License Amendment Request submitted in References (2) and (3). The NextEra Energy Point Beach (NextEra) response to the request for additional information is documented in the Enclosure.

This letter contains no new Regulatory Commitments or revisions to existing Regulatory Commitments.

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

Very truly yours,

NextEra Energy Point Beach, LLC



Robert Coffey
Site Vice President

Enclosure

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

ENCLOSURE

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

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION - POINT BEACH NUCLEAR PLANT, UNITS 1 & 2 - LICENSE AMENDMENT REQUEST 279 –ELIMINATION OF TECHNICAL SPECIFICATION SECTION 3.7.14 - PRIMARY AUXILIARY BUILDING VENTILATION - MF7261/62

SBPB RAI 1

58 FR 39132 contains the NRC's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors. In reference to the four criteria listed in 50.36(c)2(ii), the Policy Statement states: "LCOs which do not meet any of the criteria below may be proposed for removal from the Technical Specifications and relocation to licensee-controlled documents, such as the FSAR". The Policy statement further states:

If a licensee elects to apply these criteria, the requirements of the removed specifications will be relocated to the FSAR or other licensee-controlled documents. Licensees are to operate their facilities in conformance with the descriptions of their facilities and procedures in their FSAR. Changes to the facility or to procedures described in the FSAR are to be made in accordance with 10 CFR 50.59.

Please provide a description of:

- 1) Where the technical and administrative requirements proposed for removal of TS 3.7.14 (will) be located; and*
- 2) The control process(es) that will be used for relocated technical and administrative requirements.*

Response to SBPB RAI 1

The technical and administrative requirements of TS 3.7.14, Primary Auxiliary Building Ventilation (VNPAB), related to VNPAB system restart within 30 minutes following the alignment of RHR to containment sump recirculation, will not be relocated to the Point Beach Updated Safety Analysis Report (UFSAR) or Technical Requirements Manual (TRM). The operation of the VNPAB system, and the restoration of the system within two hours of a LOOP, will continue to be directed by Point Beach Emergency Operating Procedures and System Operating Instructions. Following NRC approval of LAR 279, future changes to the facility will be made in accordance with 10 CFR 50.59, and established processes and procedures.

SBPB RAI 2

From Unit 1 NextEra Energy Point Beach, LLC; Docket No. 50-266; Renewed Facility Operating License; Renewed License No. DPR-24.

Page C-3 of "Appendix C Additional Conditions Operating License DPR-24" TS Amendment 240 "Additional Condition" has an "Implementation Date" of "No later than the Unit 2 (2011) refueling outage." The "Additional Condition" reads:

"NextEra Energy Point Beach, LLC shall modify the primary auxiliary building (PAB) ventilation system (VNPAB) to ensure redundancy of active components needed to operate the PAB exhaust system. VNPAB components required to direct radioactive releases in the PAB to the vent stack shall be upgraded to an augmented quality status. No credit is taken by AST for the PAB charcoal filters. NextEra Energy Point Beach, LLC shall revise PBNP EOPs to address starting the VNPAB fans."

From Unit 2 NextEra Energy Point Beach, LLC; Docket No. 50-301; Renewed Facility Operating License; Renewed License No. DPR-27.

Page C-3 of "Appendix C Additional Conditions Operating License DPR-27" TS Amendment 244 "Additional Condition" and "Implementation Date" reads identical to Unit 1.

Discussion:

With Staff's pending approval of the LAR 279 associated with References 1 and 2, no credit will be taken in the future for **either** the PAB filters **or** for the PAB filter exhaust fans & stack fans.

Accordingly to LAR 279, the Licensee will be removing the step in the EOPs which instructs the following operator action: "Manual operator action to restore the VNPAB will occur within 30 minutes following the alignment of RHR to containment sump recirculation mode of operation. If a loss of coolant accident (LOCA) occurs coincident with a loss of off-site power (LOOP), the VNPAB will be manually restarted to ensure that the auxiliary building vent stack is the source of the release associated with the emergency core cooling system (ECCS) leakage phase of the event."

The Staff notes that LAR 279 does not propose to either modify or to eliminate the "Additional Condition" for either Renewed License No. DPR-24 (Unit 1) or Renewed License No. DPR-27 (Unit 2) to reflect the accurate PBNP licensing basis.

The Staff requests that the License consider revision or elimination of these "Additional Conditions" to reflect this new licensing basis of PBNP.

Response to SBPB RAI 2

In Reference (4), NextEra Point Beach License Amendment Request 280 (NRC 2016-0002), NextEra requested the deletion of the following condition from "Appendix C Additional Conditions Operating License DPR-24" and "Appendix C Additional Conditions Operating License DPR-27":

"NextEra Energy Point Beach, LLC shall modify the primary auxiliary building (PAB) ventilation system (VNPAB) to ensure redundancy of active components needed to operate the PAB exhaust system. VNPAB components required to direct radioactive releases in the PAB to the vent stack shall be upgraded to an augmented quality status. No credit is taken by AST for the PAB charcoal filters. NextEra Energy Point Beach, LLC shall revise PBNP EOPs to address starting the VNPAB fans."

These "Additional Conditions" will be removed from Operating Licenses DPR-24 and DPR-27 following NRC approval of License Amendment Request 280.

SBPB RAI 3

From Section 3.2 of LAR 279 dated January 15, 2016 (Reference 1):

"Elimination of Credit for Manual Operator Actions

AST implementation credited the following operator action:

Manual operator action to restore the VNPAB will occur within 30 minutes following the alignment of RHR to containment sump recirculation mode of operation. If a loss of coolant accident (LOCA) occurs coincident with a loss of off-site power (LOOP), the VNPAB will be manually restarted to ensure that the auxiliary building vent stack is the source of the release associated with the emergency core cooling system (ECCS) leakage phase of the event.

The analysis supporting AST does not credit the VNPAB exhaust system; therefore, NextEra proposes to delete the previously credited operator actions related to operation of the VNPAB system."

From NRC SE dated March 25, 2011 (Reference 3) for PBNP Amendments 238 and 242 the VNPAB provides a ventilation (i.e. cooling) function to the recently installed safety related MDAFW pumps and their 350 HP motors located in separate rooms in the 8' elevation of the Primary Auxiliary Building (PAB). SE Section 3.3.8 reads in part:

"3.3.8 Heating Ventilation and Air Conditioning

The new, MDAFW pumps and their 350 HP motors will each be located in separate rooms in the 8' elevation of the PAB. These rooms have a large opening to the general area of the PAB, which contains safety-related instrumentation and safety-related pumps. The general area of the PAB is cooled by the Primary Auxiliary Building Ventilation System (VNPAB). The VNPAB is a non-safety related system. However, in the current licensing basis, the system takes credit for providing sufficient control of building temperatures during accident

conditions to maintain equipment within operational temperature limits. In a letter dated October 15, 2010, the licensee clarified the operation of the VNPAB during accident conditions as follows:

NextEra performed a pre-EPU evaluation, results of which shows that placing the VNPAB in service within approximately two hours of the worst-case DBA with a loss of offsite power (LOOP), assures functionality of the post-accident monitoring instrumentation contained in the PAB. In the current licensing basis, procedures direct that equipment be restored following DBAs with LOOP. These procedures permit the operators to manually restore loads that are stripped following an SI in accordance with the EDG load management guidance and plant conditions. The two hours stipulated in the capability evaluation has not been formalized as such into plant procedures at the present time because it was used in the evaluation as a minimum gross capability and not as a design limit. The existing procedural instructions are being revised in accordance with the provisions of the corrective action program and the 10 CFR 50.59 process. NextEra will validate the requirement to restore VNPAB prior to implementation of the revised operating procedures and training associated with the installation of the new AFW system.

The new MDAFW pumps have a shaft mounted fan that eliminates the need for an external fluid to provide shaft or seal cooling. The additional heat due to this arrangement and the pump motor heat will add to the overall PAB heat load. The rooms in which the new MDAFW pumps will be located are equipped with a return air register to pull air into the room from the general area of the PAB. In a letter dated October 15, 2010, the licensee stated that restoration of the VNPAB within two hours assures adequate cooling for PAB safety-related equipment, including the additional heat load from operation of the new MDAFW pumps. Further, in a letter dated November 12, 2010, the licensee proposed the following regulatory commitment:

- *Validation of the time requirement to restore Primary Auxiliary Building Ventilation (VNPAB) will be completed as part of implementation of the revised operating procedures and training associated with the installation of the new Auxiliary Feedwater (AFW) system no later than the Unit 2 (2011) refueling outage.”*

Discussion:

The Staff notes with approval of LAR 279, that the Licensee will be removing the VNPAB startup @ 30 minutes from the PBNP EOP. However, the requirement from Amendments 238 and 242 to have the VNPAB running within 2 hours of certain DBAs with coincident LOOP remains.

It is not clear to the Staff if these “other” required startups of the VNPAB, as required for safety related component cooling and controlled by current plant procedures, will be impacted by this change to the PBNP EOP. The Staff requests additional information on this issue.

Response to SBPB RAI 3

In Reference (5), NextEra Point Beach letter (NRC 2010-0179) to NRC, dated November 12, 2010, NextEra proposed the following regulatory commitment:

"Validation of the time requirement to restore Primary Auxiliary Building Ventilation (VNPAB) will be completed as part of implementation of the revised operating procedures and training associated with the installation of the new Auxiliary Feedwater (AFW) system no later than the Unit 2 (2011) refueling outage."

Point Beach performed validation of the time requirement to restore the Primary Auxiliary Building Ventilation (VNPAB) system. The validation demonstrated the restoration of the VNPAB system within two (2) hours. Point Beach UFSAR Section 9.5, "Primary Auxiliary Building Ventilation System", states:

"Restoration of the VNPAB system within two hours of a LOOP assures adequate cooling for PAB safety related equipment during the worst case design basis accident."

Emergency Operating Procedures and System Operating Instructions will continue to include the restoration of the VNPAB system in support of the above UFSAR statement.

SBPB RAI 4

From NRC Staff Safety Evaluation dated April, 14, 2011 (Reference 4) Attachment 3 "Summary of Licensee Commitments," the Licensee made the following commitment:

"The VNPAB system will be added to the scope of the Maintenance Rule (10 CFR 50.65) and the scope of the License Renewal Program (10 CFR 54.37(b)). These actions will be completed no later than the Unit 2 (2011) refueling outage that implements the LAR."

From the third paragraph of LAR 279 (Reference 1) Section 3.1 reads:

"The VNPAB system is classified as non-safety related; however, components in the exhaust system required to direct radioactive releases in the auxiliary building to the vent stack are classified as Augmented Quality. The VNPAB exhaust system design provides redundancy for all active mechanical components and active and passive electrical components needed to provide PAB exhaust flow."

From LAR 279 Section 4.3 "Significant Hazards Consideration" reads in part:

"The proposed change deletes Technical Specification (TS) 3.7.14, Primary Auxiliary Building Ventilation (VNPAB) and its associated TS Bases. The VNPAB system is not part of the primary success path for mitigation of a design basis accident (DBA) and does not meet the criteria of 10 CFR 50.36 that requires a TS limiting condition for operation."

As required by 10 CFR 50.91(a), NextEra has evaluated the proposed change to the Point Beach TS using the criteria in 10 CFR 50.92 and determined that the proposed change does not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below.

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The **proposed change does not impact** the physical configuration or function of plant structures, systems, or components (SSCs) or **the manner in which SSCs are operated, maintained, modified, tested, or inspected**. No actual facility equipment or accident analyses are affected by the proposed changes. [**Bold font adds Staff emphasis**]

The control room dose analysis for a loss of coolant accident using alternate source term (AST) initially credited operation of the VNPAB exhaust system. However, the analysis was subsequently revised to remove credit for the VNPAB prior to NRC final approval of implementation of AST. As a result, NextEra is proposing to remove the VNPAB system from the TS. The VNPAB system is not an initiator of accidents and does not function to mitigate the consequences of DBAs.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.”

Discussion:

The Staff notes that LAR 279 provides no specific information for the future maintenance plans for the VNPAB. That is, as to whether a portion of the VNPAB, the exhaust system to the plant stack, will be maintained as an “Augmented Quality” System and consistent with the Commitment contained in the NRC Staff Safety Evaluation of April, 14, 2011 (Reference 4). The Staff requests additional information on this issue.

Response to SBPB RAI 4

In NRC Staff Safety Evaluation dated April, 14, 2011 (Reference 6) Attachment 3, “Summary of Licensee Commitments,” NextEra made the following commitment:

“The VNPAB system will be added to the scope of the Maintenance Rule (10 CFR 50.65) and the scope of the License Renewal Program (10 CFR 54.37(b)). These actions will be completed no later than the Unit 2 (2011) refueling outage that implements the LAR.”

Following NRC approval of LAR 279, the VNPAB system will remain within the scope of the Maintenance Rule (10 CFR 50.65), and the scope of the License Renewal Program (10 CFR 54.37(b)).

Point Beach UFSAR Section 9.5, "Primary Auxiliary Building Ventilation System", states:

"Restoration of the VNPAB system within two hours of a LOOP assures adequate cooling for PAB safety related equipment during the worst case design basis accident."

The Augmented Quality VNPAB components, that support the above statement from UFSAR Section 9.5, will retain their Augmented Quality status.

References:

- (1) NRC Electronic Mail to NextEra Energy Point Beach, dated June 27, 2016, "Request for Additional Information - License Amendment Request 279 –Elimination of Technical Specification Section 3.7.14 - Primary Auxiliary Building Ventilation" (MF7261/62)
- (2) NextEra Energy Point Beach letter (NRC 2015-0075) to NRC dated January 15, 2016, "License Amendment Request 279, Elimination of Technical Specification 3.7.14, Primary Auxiliary Building Ventilation" (ML16015A112)
- (3) NextEra Energy Point Beach letter (NRC 2016-0018) to NRC dated April 27, 2016, "License Amendment Request 279, Elimination of Technical Specification 3.7.14, Primary Auxiliary Building Ventilation" (ML16118A316)
- (4) NextEra Energy Point Beach letter (NRC 2016-0002) to NRC, dated February 12, 2016, "License Amendment Request 280, Removal of Completed License Conditions and Change to the Ventilation Filter Testing Program" (ML16043A217)
- (5) NextEra Energy Point Beach letter (NRC 2010-0179) to NRC, dated November 12, 2010, "License Amendment Request 261 Extended Power Uprate Response to Request for Additional Information" (ML103160385)
- (6) NRC Staff Safety Evaluation, dated April 14, 2011, "Point Beach Nuclear Plant (PBNP), Units 1 and 2 - Issuance of License Amendments Regarding Use of Alternate Source Term (ML110240054)