



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

June 27, 2017

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

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 – CORRECTION LETTER FOR AMENDMENT NOS. 258 AND 262 RE: REMOVAL OF COMPLETED LICENSE CONDITIONS AND CHANGES TO THE VENTILATION FILTER TESTING PROGRAM (CAC NOS. MF7352 AND MF7353)

Dear Mr. Coffey:

On February 22, 2017 (Agencywide Documents Access and Management System Accession (ADAMS) Accession No. ML17039A300), the U.S. Nuclear Regulatory Commission (NRC) issued Amendment Nos. 258 and 262 to Renewed Facility Operating License Nos. DPR-24 and DPR-27 for the Point Beach Nuclear Plant (PNBP), Units 1 and 2, respectively. This amendment consisted of changes to the technical specifications (TSs) in response to your application dated February 12, 2016, supplemented by letters dated July 11, 2016, and November 4, 2016. The amendments removed license conditions that have been completed and are no longer in effect and revised a charcoal testing criterion for the control room emergency filtration system.

Following issuance of the amendments, the licensee informed the NRC staff that while the attached pages of the Renewed Facility Operating Licenses were correct, there were errors in the description of the changes on page 2 of Enclosure 1 and page 2 of Enclosure 2. Specifically:

1. The amendment deleted Section 4.E, "Safety Injection Logic," of Renewed Facility Operating Licenses DPR-24 and DPR-27. However, the description of the change on page 2 of Enclosure 1 and page 2 of Enclosure 2 inadvertently left the title.

The previous text read:

E. Safety Injection Logic

Deleted

The revised text reads:

E. Deleted

2. The description of the changes in Item 3 on page 2 of Enclosure 2 inadvertently identified the deletion of the Additional Condition associated with Amendment no. 178. This Additional Condition associated with Amendment no. 178 was deleted by a previous amendment.

The previous text read:

3. The following additional conditions of the Appendix C, "Additional Conditions," of the Renewed Facility Operating License No. DPR-27 are deleted:

<u>Amendment Number</u>	<u>Additional Condition</u>	<u>Implementation Date</u>
178	Deleted	
206	Deleted	
206	Deleted ...	

The revised text reads:

3. The following additional conditions of the Appendix C, "Additional Conditions," of the Renewed Facility Operating License No. DPR-27 are deleted:

<u>Amendment Number</u>	<u>Additional Condition</u>	<u>Implementation Date</u>
206	Deleted	
206	Deleted ...	

In addition, the licensee identified an error in the NRC staff Safety Evaluation. Section 3.4.3 of the NRC Safety Evaluation incorrectly references the American Society for Testing Materials (ASTM) standard ASTM D-3803-1991. The correct version is ASTM D-3803-1989.

The NRC staff determined that these errors were entirely administrative in nature, were inadvertently introduced, and did not affect the associated notice to the public. Enclosed are the following replacement pages for the amendments dated February 22, 2017: Enclosure 1, page 2; Enclosure 2, page 2; and Enclosure 3, page 7. The revised pages contain marginal lines indicating the areas of change.

These corrections do not change any of the conclusions in the safety evaluation associated with the amendments. We regret any inconvenience this may have caused. If you have any questions regarding this matter, I may be reached at 301-415-8371.

Sincerely,



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

Docket Nos. 50-266 and 50-301

Enclosure:
Correction Pages

cc: Distribution via ListServ

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DATE	06/27/17	06/27/17	

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Enclosure
Correction Pages

E. Deleted

I. Deleted

J. Deleted

3. The following additional conditions of the Appendix C, "Additional Conditions," of the Renewed Facility Operating License No. DPR-24 are deleted:

<u>Amendment Number</u>	<u>Additional Condition</u>	<u>Implementation Date</u>
201	Deleted	
201	Deleted	
238	Deleted	
238	Deleted	
240	Deleted	
240	Deleted	
240	Deleted	
240	Deleted	
240	Deleted	
240	Deleted	
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240	Deleted	
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E. Deleted

H. Deleted

I. Deleted

3. The following additional conditions of the Appendix C, "Additional Conditions," of the Renewed Facility Operating License No. DPR-27 are deleted:

<u>Amendment Number</u>	<u>Additional Condition</u>	<u>Implementation Date</u>
206	Deleted	
206	Deleted	
242	Deleted	
242	Deleted	
244	Deleted	
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3.4.3 Staff Evaluation

Change in methyl iodide penetration test criterion

The change in methyl iodide penetration from ≤ 1.0 percent to ≤ 2.5 percent is based on the credit taken in the dose consequence analysis for the removal of methyl (organic) iodide as a result of the operation of the control room filter system. As shown in Table 3.2-9 of the NRC staff's AST SE entitled, "Point Beach Nuclear Plant Units 1 and 2 Control Room Parameters," the control room dose consequence analyses credits a removal efficiency of 95 percent for methyl iodide (Ref. 8.10). As shown below, Table 1 from RG 1.52, Revision 3, indicates that in order to credit an elemental and organic removal efficiency of 95 percent the acceptance criterion is a penetration of ≤ 2.5 percent when tested in accordance with ASTM D-3803-1989.

**Table 1 from RG 1.52, Revision 3
Laboratory Tests for Activated Carbon**

Activated Carbon Total Bed Depth	Maximum Assigned Credit for Activated Carbon Decontamination Efficiencies		Methyl Iodide Penetration Acceptance Criterion for Representative Sample
	Elemental iodine	Organic iodine	
2 inches	Elemental iodine	95%	Penetration $\leq 2.5\%$ when tested in accordance with ASTM D-3803- 1989
	Organic iodide	95%	
4 inches or greater	Elemental iodine	99%	Penetration $\leq 0.5\%$ when tested in accordance with ASTM D-3803- 1989
	Organic iodide	99%	

The licensee's proposed change in testing criteria is consistent with the RG 1.52 guidance for the credit assumed in the AST dose consequence analyses.

TS 5.5.10.c currently requires that testing a sample of the carbon adsorber from CREFS filter (F-16) results in a methyl iodide penetration of less than or equal to 1.0 percent.

The NRC staff notes that the TS 5.5.10 current acceptance criteria, of a methyl iodide penetration of less than or equal to 1.0 percent, is consistent with the acceptance criteria of Table 2, "Laboratory Tests for Activated Carbon," of RG 1.52, Revision 2 (Ref. 8.26), for a 2 inch "Activated Carbon Bed Depth" air filtration system operated outside the containment.

Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal" (Ref. 8.23), and NUREG-1431, Standard Technical Specifications (STS), Westinghouse Plants (Ref.8.22), discuss that the methyl iodide efficiency should be the value that was incorporated in the licensee's accident analysis. These two NRC documents also state that the staff will accept a safety factor greater than or equal to two when ASTM D3803-1989 (Ref. 8.21), is used with 30 ° C (86 ° F) and 95 percent relative humidity (RH) for charcoal bed filtration trains without humidity control.