



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

July 25, 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 – AUDIT PLAN AND SETUP OF ONLINE REFERENCE PORTAL FOR LICENSE AMENDMENT REQUEST – RISK-INFORMED APPROACH TO RESOLVE CONSTRUCTION TRUSS DESIGN CODE NONCONFORMANCES (CAC NOS. MF9532 AND MF9533)

Dear Mr. Coffey:

By application dated March 31, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17090A511), NextEra Energy Point Beach, LLC (NextEra) (the licensee) submitted a license amendment request for the Point Beach Nuclear Plant (PBNP), Units 1 and 2. The proposed change will document a risk-informed resolution to resolve low risk, legacy design code nonconformances associated with construction trusses in the containment buildings of PBNP, Units 1 and 2.

To improve the efficiency of the U.S. Nuclear Regulatory Commission (NRC) reviews, the licensee's representatives and the NRC staff have discussed the use of an audit using an online reference portal that would allow the NRC staff and contractors limited read-only access to the basis documents and other reference materials cited in the applications. The staff plans to initially conduct a desk audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit basis documents to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. Documents identified as necessary for analysis of the application will be identified by the NRC staff. The licensee will be formally requested to submit those documents on the NRC docket. Use of the online reference portal is acceptable, as long as the following conditions are met:

- The online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- The online reference portal will be sufficiently secure to prevent staff from printing, saving, or downloading any documents; and
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The NRC staff would like to request that the portal be populated with the documents listed in the enclosure to this letter. This is the initial list identified by the NRC staff. The staff may request additional documents during the review, which will be transmitted to you via email. This will help with the preparation for a possible site audit, and possibly a walk-down in the containment during an outage to increase effectiveness of the review prior to the audit. Please provide NRC staff access to the portal and send me the information needed to access the portal, such as username and password, as soon as possible.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. Please provide written confirmation that NextEra agrees to the terms and conditions set forth in this letter.

If you have any questions, please contact me at (301) 415-8371.

Sincerely,



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

Docket Nos. 50-266 and 50-301

Enclosures:

1. Audit Plan
2. Requested Documents for the LAR

cc: Distribution via Listserv

AUDIT PLAN

BACKGROUND

Due to the first-of-a-kind risk-informed approach used by the licensee to resolve the non-conformances additional engagement with the licensee beyond requests for additional information (RAIs), is expected. Such anticipated engagement includes the review of documents on a licensee-established electronic portal, site audit, and possibly a walk-down in the containment during an outage.

REGULATORY AUDIT BASES

An audit was determined to be the most efficient approach toward a timely resolution of questions associated with this license amendment request review, since the U.S. Nuclear Regulatory Commission (NRC) staff will have an opportunity to minimize the potential for further rounds of RAIs and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination. The staff is requesting an initial set of documentation to be reviewed at the NRC headquarters. Upon completion of this desk audit, the staff is expected to achieve the following.

1. Determine the need for additional documentation.
2. Develop a request for additional information.
3. Decide if a site audit and a walk-down is required to verify information.

The RAIs will be issued soon after the audit, with an expected response being delivered by the licensee by an agreed upon date. The information discussed in the audit to be included in the development of the technical NRC staff's safety evaluation will be requested to be submitted on the docket.

REGULATORY AUDIT SCOPE OR METHODOLOGY

The desk audit is being conducted to get a better understanding of the submittal and the availability of the information to make an assessment of the staff's review approach. The areas of focus for the regulatory audit is the information that will be requested by the NRC. The staff will review the documentation and generate any RAIs necessary to complete the review. It will also lead to the decision if a site audit is necessary.

INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The information required for the initial desk audit is included in Enclosure 2. The licensee will be informed via electronic mail if there is a need for additional supporting documentation.

TEAM ASSIGNMENTS

Key licensee personnel involved in the development of the RAI responses should be made available on a mutually agreeable schedule to respond to any questions from the NRC staff.

Team Member	Title	Division	Area of Responsibility
Mahesh Chawla	Project Manager	NRR/DORL/LPL3	Project Management
Sara Lyons	Reliability and Risk Analyst	NRR/DRA/APLB	Reliability and Risk Analysis
Shilp Vasavada	Reliability and Risk Analyst		
Dan Hoang	Structural Engineer	NRR/DE/ESEB	Deterministic Review
Fred Forsaty	Reactor Systems Engineer	DSS/SRXB	
Steve Jones	Senior Reactor Systems Engineer	DSS/SBPB	
Kamal Manoly	Senior Level Advisor For Structural Mechanics	NRR/DE	Senior Advisor

LOGISTICS

The audit will be started once an electronic portal is set up and the documentation is made available to the NRC staff. The desk audit will be conducted over a few weeks consistent with the internal review schedule for the issuance of the request for additional information. The licensee will be kept informed on a regular basis during bi-weekly discussions with the project manager regarding the progress and the decision to arrange a site visit.

DELIVERABLES

The NRC team will develop an audit summary report to convey the results. The report will be placed in Agencywide Documents Access and Management System (ADAMS) within 30 days of the completion of the final audit session. The NRC will also finalize the RAIs after completion of the audit and issue them to the licensee.

**LIST OF SHAREPOINT PORTAL REQUESTED DOCUMENTS FOR THE LICENSE
AMENDMENT REQUEST (LAR)**

Document #	Cross-reference to the LAR	Report title and number
1	Reference 3 in Enclosure 4	Point Beach CT Target Assessment, PBN-BFJR-17-020
2	Not Applicable	Photographs and videos from walkdown performed to support containment truss target assessment (it would be most beneficial if the photographs and videos showed the components of interest for the assessment in relation to the containment trusses and any barriers)
3	Reference 5.5 in Enclosure 5	11Q0060-C-005, Rev. 1, "SSI Analysis of Containment Building for Response Spectra at Supports of Dome Truss"
4	Reference 5.8 in Enclosure 5	11Q0060-C-022, Rev. 0, "Thermal Evaluation of Unit 1 Containment Dome Truss in Support of Risk Informed LAR"
5	Reference 5.9 in Enclosure 5	11Q0060-C-023, Rev. 0, "Thermal Evaluation of Unit 2 Containment Dome Truss in Support of Risk Informed LAR"
6	Reference 5.10 in Enclosure 5	11Q0060-C-024, Rev. 0, "Seismic Evaluation of Unit 1 Containment Dome Truss in Support of Risk Informed LAR"
7	Reference 5.11 in Enclosure 5	11Q0060-C-025, Rev. 0, "Seismic Evaluation of Unit 2 Containment Dome Truss in Support of Risk Informed LAR"
8	Reference 5.14 in Enclosure 5	11Q0060-C-028, Rev. 0, "Seismic Fragility Analysis of Containment Dome Trusses"
9	Reference 5.16 in Enclosure 5	11Q0060-C-030, Rev. 0, "Probability of Failure vs Temperature for Unit 1 Containment Dome Truss in Support of Risk Informed LAR"
10	Reference 5.17 in Enclosure 5	11Q0060-C-031, Rev. 0, "Probability of Failure vs Temperature for Unit 1 Containment Dome Truss in Support of Risk Informed LAR"
11	Reference 5.18 in Enclosure 5	11Q0060-C-032, Rev. 0, "Evaluation of Unit 1 Containment Spray Piping under Seismic Loading Using GMRS Input in Support of Risk Informed LAR"
12	Reference 5.19 in Enclosure 5	11Q0060-C-033, Rev. 0, "Evaluation of Unit 1 Containment Spray Piping under Seismic Loading Using GMRS Input in Support of Risk Informed LAR"
13	Reference 5.20 in Enclosure 5	11Q0060-C-034, Rev. 0, "Analysis of Containment Liner to Determine Elastic Limit under Contact Load from CDT"
14	Reference 5.24 in Enclosure 5	11Q0060-C-038, Rev. 0, "Seismic Strength Capacity of Units 1 and 2 Containment Dome

Document #	Cross-reference to the LAR	Report title and number
		Trusses with Modifications to Meet AISC N690 Acceptance Criteria"
15	Not applicable	The licensee indicated that a peer review was conducted for the PRA analysis as well as the seismic and thermal fragility analyses. Provide peer review procedures, guidance, or acceptance standards; applicable self-assessment report which was provided to the peer review team; and peer review team report.
16	Ref. 4.1 in Enclosure 5	Drawing C-125, Rev.10
17	Ref. 4.2 in Enclosure 5	Dome Truss shop drawings (from 4.2.1 – 4.2.17)
18	Ref. 3.10 in Enclosure 5	Westinghouse letter WEP-97-541, dated December 8, 1997
19	Ref. 5.1 in Enclosure 5	Bechtel Job 6118-Vol 8 – Book 44 "Seismic Analysis – Containment"
20	Ref. 5.2 in Enclosure 5	6904-15-TR, Rev. 0, "calc. for Adequacy of Containment Dome Truss"
21	Ref. 5.4 in Enclosure 5	11Q0060-C-001, Rev.0, Including CCN-001 and CCN-002

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DISTRIBUTION:

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- SLyons, NRR
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- DHoang, NRR
- NChokshi, NRO
- JCameron, R3
- THartman, R3
- KBarclay, R3

ADAMS Accession No. ML17202G591

OFFICE	DORL/LPL3/PM	DORL/LPL3-2/LA	DRA/APLB/BC	DE/ESEB/BC
NAME	MChawla	SRohrer	GCasto	BWittick
DATE	07/24/17	07/24/17	07/24/17	07/25/17
OFFICE	DSS/SRXB/BC	DSS/SBPB/BC	DORL/LPL3/BC	DORL/LPL3/PM
NAME	EOesterle	RDennig	DWrona	MChawla
DATE	07/24/17	07/24/17	07/25/17	07/25/17

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