

August 13, 2020

NRC 2020-0020
10 CFR 50.90

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

Point Beach Nuclear Plant, Unit 1
Dockets 50-266
Renewed License Nos. DPR-24

License Amendment Request (LAR) 293, One-Time Extension of Renewed Facility Operating License Condition 4.I, Containment Building Construction Truss

Reference:

1. NRC letter to NextEra Energy Point Beach, LLC, Point Beach Nuclear Plant, Units 1 and 2 – Issuance of Amendments for Risk-Informed Approach to Resolve Construction Truss Design Code Nonconformances (EPID L-2017-LLA-0209) dated March 26, 2019 (ADAMS Accession No. ML18345A110)

Pursuant to 10 CFR 50.90 and 10 CFR Part 50.91(a)(6), NextEra Energy Point Beach, LLC (NextEra) requests an amendment to Renewed Facility Operating License (RFOL) DPR-24 for Point Beach Nuclear Plant, Unit 1. The proposed LAR modifies Point Beach Unit 1 RFOL Condition 4.I, Containment Building Construction Truss, by extending elements of the RFOL Condition 4.I, on a one-time basis for another eighteen months to the Spring of 2022, when the Unit 1 Cycle 40 refueling outage is currently scheduled. The RFOL Condition 4.I is associated with the requirement to complete modifications to resolve low risk legacy design code nonconformances associated with construction truss in the containment building of Point Beach Unit 1 as approved in Reference 1. The one-time license amendment is required due to unforeseen issues as a result of the current COVID-19 virus pandemic.

The enclosure to this letter contains NextEra's evaluation of the proposed change. Attachment 1 to the enclosure provides a mark-up of the existing RFOL page to show the proposed change. Attachment 2 to the enclosure provides the RFOL page retyped (clean copy) to show the proposed change. Attachment 3 to the enclosure provides an update to the implementation items required to resolve the construction truss design code nonconformances.

NextEra has determined that this LAR does not involve a significant hazard consideration as determined in accordance with 10 CFR 50.92. Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the proposed license amendment.

The proposed license amendment is prompted due to circumstances related to the effects of the COVID-19 virus pandemic. NextEra respectfully requests staff review and approval by October 01, 2020, prior to Point Beach Unit shutdown for refueling maintenance activities.

NextEra Energy Point Beach, LLC

6610 Nuclear Road, Two Rivers, WI 54241

The proposed LAR has been reviewed by the Point Beach Nuclear Plant Onsite Review Group. Pursuant to 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the State of Wisconsin.

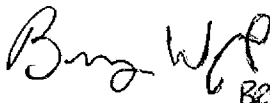
This submittal contains no new regulatory commitments.

Should you have any questions regarding this submittal, please contact Mr. Eric Schultz, Licensing Manager, at (920) 755-7854.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 13th day of August 2020.

Sincerely,



Michael Strope
Site Vice President
NextEra Energy Point Beach, LLC

*BEYOND WYATK
ACTING*

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
Public Service Commission Wisconsin

Evaluation of the Proposed Change

NextEra Energy Point Beach, LLC

License Amendment Request (LAR) 293 - One-Time Extension of Renewed Facility Operating License
Condition 4.I, Containment Building Construction Truss

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ENCLOSURE 1

NEXTERA'S EVALUATION OF THE PROPOSED CHANGE

1.0 SUMMARY DESCRIPTION

NextEra requests an amendment to Renewed Facility Operating License (RFOL) DPR-24 for Point Beach Nuclear Plant, Unit 1. The proposed License Amendment Request (LAR) modifies Point Beach Unit 1 RFOL Condition 4.I, Containment Building Construction Truss by extending, on a one-time basis, for another eighteen months to the Spring of 2022, when the Unit 1 Cycle 40 refueling outage is currently scheduled. The RFOL Condition 4.I is associated with the requirement to complete modifications to resolve low risk legacy design code nonconformances associated with construction truss in the containment building of Point Beach Unit 1 as approved in Reference 6.1. The one-time license amendment is required due to unforeseen issues as a result of the current COVID-19 virus pandemic.

On March 13, 2020, President Donald Trump declared the Coronavirus 2019 (COVID-19) pandemic a national emergency. In addition, Wisconsin Governor Tony Evers declared a public health emergency on March 12, 2020 to support efforts to respond to and contain COVID-19. Governor Tony Evers also issued an emergency order effective August 1, 2020 requiring face coverings in certain situations to prevent the spread of COVID-19.

In response to these declarations, NextEra is reducing the scope of the Unit 1 refueling outage to minimize the threat of the virus to station personnel and ensure the safe operation of Units 1 and 2 during this pandemic. The one-time extension of Point Beach Unit 1 RFOL Condition 4.I will reduce the staffing required to support the outage; thereby, reducing the probability of spread of the coronavirus. This request is consistent with measures taken by NRC as reflected in IMC 2515 Appendix E dated March 27, 2020 [ADAMS Accession No. ML20079E700].

NextEra respectfully requests staff review and approval by October 01, 2020 prior to Point Beach Unit 1 refueling maintenance outage.

2.0 DETAILED DESCRIPTION

2.1 Background

Reference 6.1 amended RFOL DPR-24 for Point Beach Nuclear Plant, Unit 1. This amendment provided that "NextEra Energy Point Beach shall complete implementation items 1, 2, 3, 5, and 6 included in Attachment 3 of licensee letter NRC 2019-0007, dated March 13, 2019, by the completion date specified in the Attachment." Implementation items 3 and 5 will be completed by the specified date in the Attachment.

As provided in Attachment 3 of NextEra letter NRC 2019-0007 (Reference 6.2), implementation items 1 and 2 are plant configuration modifications to be implemented during the Fall 2020 Unit 1 Refueling Outage (U1R39). Item 6 is an administrative task to revise the Updated Final Safety Analysis (UFSAR) to reflect the as-built plant upon completion of the plant modifications. The plant modification items are required to be completed to improve clearance between the truss and the containment liner at specified locations around the containment circumference. The modifications to the top chord of the trusses are necessary to achieve contact forces and component stresses within acceptable limits. The proposed modification to the containment spray pipe support (SI-301R-1-H202) increases the available seismic capacity to qualify the support for the applied loading.

The calculations prepared for the amendment that was reviewed and approved by Reference 6.1 are not affected by the requested deferral of the elements noted in Attachment 3 of this Enclosure. As described in Enclosure 5 of Reference 6.4, the Unit 1 truss structure, in the current condition, remains operable but nonconforming to the original design code of record for the design basis event or accident.

The operability evaluations concluded that the truss structures maintain structural integrity and do not pose an interaction concern with the safety related equipment adjacent to or below the truss structure. The ventilation ductwork remained within design limits and capable of performing the associated design functions. The containment spray piping and containment liner/structure were concluded to remain within operability limits and did not affect the ability of the supported systems to perform their intended design functions. The affected Structures, Systems, and Components (SSCs) are passive and there is no adverse effect on accident mitigation strategies. No compensatory measures are necessary to address the current condition.

2.2 Current Requirements

Point Beach RFOL Condition 4.1, "Containment Building Construction Truss", states NextEra Energy Point Beach shall complete implementation items 1, 2, 3, 5, and 6 included in Attachment 3 of NextEra letter NRC 2019-0007 (Reference 6.2), by the completion date specified in the Attachment.

2.3 Description of the Proposed Change

The proposed change extends on a one-time bases the RFOL Condition 4.1 implementation items 1, 2, and 6 included in Attachment 3 of NextEra letter NRC 2019-0007 (Reference 6.2). For implementation items 1 and 2, NextEra requests an additional eighteen months to the Spring of 2022, when the Unit 1 Cycle 40 refueling outage is currently scheduled. For implementation item 6, NextEra requests an additional 6 months after the completion of Unit 1 Cycle 40 refueling outage to complete this implementation item. Updates to implementation dates are included in Attachment 3 of this Enclosure.

2.4 Reason for the Proposed Change

The requested one-time license amendment extension to RFOL Condition 4.1 for another eighteen months is required due to unforeseen circumstances as a result of the current COVID-19 pandemic.

Due to the unpredictable nature of the COVID-19 pandemic, NextEra does not want to potentially expose and jeopardize the health and safety of team members. NextEra has determined that reducing the number of employees required for the Unit 1 Cycle 39 refueling outage and a reduction in outage scope and duration would thereby reduce the probability of spread of COVID-19 and ensure the safe operation of Units 1 and 2.

NextEra only recently determined it would not be prudent to perform the required maintenance activities during this outage. Once NextEra reached this determination, it has endeavored to submit this amendment request as quickly as possible, while keeping in mind the need for the request to be complete, accurate, and of sufficient detail to allow the NRC to perform its review.

3.0 TECHNICAL EVALUATION

The proposed license amendment modifies the Point Beach RFOL Condition 4.1 by extending, on a one-time basis, items 1, 2, and 6 included in Attachment 3 of NextEra letter NRC 2019-0007 (Reference 6.2) to that as specified in Attachment 3 of this Enclosure.

3.1 Background Information

The calculations prepared for the amendment that was reviewed and approved by Reference 6.1 are not affected by the requested deferral of the elements noted in Attachment 3 of this Enclosure. As described in Enclosure 5 of Reference 6.4, the Unit 1 truss structure, in the current condition, remains operable but nonconforming to the original design code of record for the design basis event or accident. The affected Structures, Systems, and Components (SSCs) are passive and there is no adverse effect on accident mitigation strategies.

3.2 Actions Taken and Actions Pending

3.2.1 Actions Taken

In April 2014, Unit 1 was electively taken off-line and inspected. A nonconformance was identified with certain bearing box bolts. The condition was corrected by modification to center the bolts at the required locations to return the truss structure to the as-designed condition.

3.2.2 Actions Pending

(a) Unit 1 Spatial Clearance (Implementation Item 1)

A modification will be made to the Unit 1 construction truss to improve clearance between the truss and the containment liner to achieve contact forces and component stresses within acceptable limits. The modification includes a small amount of material removal at the truss top chord structural tees. The modification will be performed at six specified locations around the circumference of containment. No change is required to the methods of evaluation or acceptance limits defined for these components/members.

(b) Unit 1 Containment Spray Pipe Support (Implementation Item 2)

One containment spray pipe support in Unit 1, SI-301R-1-H202, will be modified to achieve additional seismic capacity. The modification will increase the size of the support's U-bolt diameter.

(c) Unit 1 and Unit 2 New Construction Truss Design Code Conformance Items (Implementation Item 6)

NextEra will revise the Point Beach Units 1 and 2 UFSAR to include the evaluation methods and acceptance criteria identified in the Table in response to RAI-1.a, in NextEra letter NRC 2018-0014 (Reference 6.3). NextEra will revise the Point Beach Units 1 and 2 UFSAR to reclassify the construction truss as stated in its response to RAI-17 in NextEra letter NRC 2018-0014.

3.3 Technical Evaluation Summary

The calculations prepared for the amendment that was reviewed and approved by Reference 6.1 are not affected by the requested deferral of the elements noted in Attachment 3 of this Enclosure. These calculations support the determination of low risk by concluding the construction truss, equipment supported by the truss, and the

containment liners maintain structural integrity during a design basis seismic or thermal event. Consequently, there are no changes to any existing design functions and there is no change to station accident response credited in the safety analyses.

As described in Enclosure 5 of Reference 6.4, the Unit 1 truss structure, in the current condition, remains operable but nonconforming to the original design code of record for the design basis event or accident.

The one-time extension to the RFOL Condition 4.I does not change the operable but nonconforming declaration for Point Beach Unit 1 SSCs for the extended period.

The previous PRA evaluation completed for Reference 6.1 concluded that with the final configuration of the modified construction truss, the risks remain within acceptance guidelines shown in Regulatory Guide 1.174, Figures 4 and 5, and are consistent with the intent of the Commission's Safety Goal Policy Statement. Since the previous PRA evaluation was performed for the final plant configuration, without consideration for when the modifications would be complete, the results of the previous PRA evaluation do not change if the implementation items identified in Attachment 3 of this Enclosure are extended, as requested.

A one-time extension to the RFOL Condition 4.I for items 1, 2, and 6 included in Attachment 3 of NextEra letter NRC 2019-0007 (Reference 6.2) to that as specified in Attachment 3 of this Enclosure is appropriate and does not impact the safe operation of Units 1 and 2.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The applicable General Design Criterion (GDC) and license basis design requirements are addressed in Reference 6.1. No relief from GDC requirements is requested. This change does not impact the station Technical Specifications.

The proposed one-time extension to the RFOL Condition 4.I for items 1, 2, and 6 included in Attachment 3 of NextEra letter NRC 2019-0007 (Reference 6.2) to that as specified in Attachment 3 of this Enclosure does not alter the manner in which Point Beach will be operated and maintained. All applicable regulatory requirements will continue to be satisfied as a result of the proposed amendment.

4.2 No Significant Hazards Evaluation

The proposed license amendment modifies the Point Beach RFOL Condition 4.I by extending, on a one-time basis, items 1, 2, and 6 included in Attachment 3 of NextEra letter NRC 2019-0007 (Reference 6.2) to that as specified in Attachment 3 of this Enclosure. As required by 10 CFR 50.91(a), NextEra has evaluated the proposed change using the criteria in 10 CFR 50.92 and has determined that the proposed change does not involve a significant hazards consideration. An analysis of the issue of no significant hazard consideration is presented below:

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

Response: No

The probability of an accident previously evaluated is not changed. The containment structures and the containment spray piping and ventilation ducts attached to the

construction truss are accident mitigation equipment. They are not accident initiators.

The calculations prepared for the amendment that was reviewed and approved by Reference 6.1 are not affected by the requested deferral of the elements noted in Attachment 3 of this Enclosure. As described in Enclosure 5 of Reference 6.4, the Unit 1 truss structure, in the current condition, remains operable but nonconforming to the original design code of record for the design basis event or accident. The affected Structures, Systems, and Components (SSCs) are passive and there is no adverse effect on accident mitigation strategies.

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

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

This request does not install any new or different type of equipment in the plant. The proposed change does not create any new failure modes for existing equipment or any new limiting single failures.

Evaluations performed in support of operability under the original design basis conclude the construction truss, equipment supported by the truss, and containment liners remain capable of withstanding design basis seismic and thermal events and remain capable of performing their designated design functions. Additionally, the proposed change does not involve a change in the methods governing normal plant operation, and all safety functions will continue to perform as previously assumed in the accident analyses. Thus, the proposed change does not adversely affect the design function or operation of any structures, systems and components important to safety.

There are no new accidents identified associated with acceptance of the final modified configuration of Unit 1 or in the current configuration.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The containment structures and liner, construction truss, and equipment supported by the truss remain fully capable of performing their specified design functions as concluded by supporting the operability evaluations for the original design basis.

The proposed change does not affect the margin of safety associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed change does not alter any safety analyses assumptions, safety limits, limiting safety system settings, or methods of operating the plant. The changes do not adversely impact the reliability of equipment credited in the safety analyses. The proposed change does not adversely affect systems that respond to safely shutdown the plant and to maintain the plant in a safe shutdown condition.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

4.3 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL ASSESSMENT

This proposed license amendment modifies the Point Beach RFOL Condition 4.1 by extending, on a one-time basis, items 1, 2, and 6 included in Attachment 3 of NextEra letter NRC 2019-0007 (Reference 6.2) to that as specified in Attachment 3 of this Enclosure.

NextEra has determined that this proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) result in a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs be prepared in connection with the proposed change.

6.0 REFERENCES

- 6.1 NRC letter to NextEra Energy Point Beach, LLC, Point Beach Nuclear Plant, Units 1 and 2 – Issuance of Amendments for Risk-Informed Approach to Resolve Construction Truss Design Code Nonconformances (EPID L-2017-LLA-0209) dated March 26, 2019 (ADAMS Accession No. ML18345A110)
- 6.2 NextEra Energy Point Beach, LLC, letter NRC 2019-0007, Point Beach Nuclear Plant, Units 1 and 2, License Conditions and Implementation Items Required to Resolve Construction Truss Design Code Non conformances (ADAMS Accession No. ML19072A179)
- 6.3 NextEra Energy Point Beach, LLC letter NRC 2018-0014, "Construction Truss License Amendment Request 278, Response to Request for Additional Information," April 12, 2018 (ADAMS Accession No. ML18102B164)
- 6.4 NextEra Energy Point Beach, LLC letter NRC 2017-0017, "License Amendment Request 278, Risk-Informed Approach to Resolve Construction Truss Design Code Nonconformances," March 31, 2017 (ADAMS Accession No. ML17090A511)

ATTACHMENT 1

Renewed Facility Operating License - Mark-up

INSERT

Containment Building Construction Truss

NextEra Energy Point Beach shall complete implementation items 1, 2, 3, 5, and 6 included in Attachment 3 of licensee letter NRC 2019-0007 dated March 13, 2019 in accordance with Attachment 3 of the Enclosure to NRC Letter, NRC 2020-0020 dated August 13, 2020.

(1 page follows)

ATTACHMENT 2

Renewed Facility Operating License - Clean Pages

(1 page follows)

ATTACHMENT 3

Implementation Items Required to Resolve the Construction Truss Design Code Nonconformances

| IMPLEMENTATION ITEMS | COMPLETION DATE |
|---|---|
| <p>1. Unit 1 Spatial Clearance</p> <p>A modification will be implemented to the Unit 1 construction truss to improve clearance between the truss and the containment liner. The modification includes trimming the top chord at the first panel point of six trusses, specifically trusses 1, 2, 3, 7, 8, and 15, as identified in NextEra Energy Point Beach, LLC letter NRC 2018-0014, "Construction Truss License Amendment Request 278, Response to Request for Additional Information," dated April 12, 2018 (ML18102B164).</p> | <p>This modification will be implemented during the Spring 2022 Unit 1 refueling outage (U1R40)</p> |
| <p>2. Unit 1 Containment Spray Pipe Support</p> <p>Unit 1 containment spray pipe support SI-301R-1-H202 will be modified to achieve additional seismic capacity. The modification will increase the size of the support's U-bolt diameter.</p> | <p>This modification will be implemented during the Spring 2022 Unit 1 refueling outage (U1R40)</p> |
| <p>3. Unit 1 and Unit 2 New Seismic Operating Limits</p> <p>NextEra will implement new seismic operating limits applicable to Unit 1 and Unit 2 to maintain stresses in the construction trusses within elastic stress limits. The applicable bounding limits following implementation of are:</p> <p>Horizontal: 0.05g Peak Ground Acceleration Vertical: 0.04g Peak Ground Acceleration</p> <p>The existing seismic monitors will be used to detect the new operating seismic limits.</p> <p>Site procedures will be revised to initiate actions to commence a controlled dual Unit backdown to hot shutdown upon reaching the specified peak ground acceleration limits. The procedure will specify that the Units may be reduced in power individually in series, rather than concurrently, to ensure station staff have the proper resources and focus on each Unit for maximum safety and operational excellence during this off-normal operation. The procedure will also initiate inspection and/ or evaluation actions for the construction trusses, equipment supported by the trusses, and the containment liners.</p> | <p>The procedure revisions will be performed by March 31, 2021.</p> |

| | |
|--|--|
| <p>4. Unit 1 and Unit 2 New Thermal Operating Limits</p> <p>NextEra will implement new thermal operating limits applicable to Unit 1 and Unit 2 construction trusses and attached components for any thermal excursion or occurrence resulting in exceeding elastic stress limits. The proposed new operational containment temperature limits are:</p> <p>Unit 1: 227° F containment atmospheric temperature Unit 2: 236° F containment atmospheric temperature</p> <p>The station implementation of these new limits will include taking the affected Unit offline and performing an inspection and/or evaluation, as necessary, to confirm that the construction truss' future stability during a postulated design basis accident was not compromised by the thermal occurrence.</p> <p>Detection of the thermal occurrence and initiation of actions to address the new limiting values will be addressed in site procedures. The site procedures will be revised to initiate inspection and/or evaluation actions prior to Unit startup for the affected Unit's construction truss, equipment supported by the truss (as necessary), and the containment liner. No new instrumentation is required to support this change. Existing station instrumentation will be utilized for containment temperature identification.</p> | <p>The procedure revisions will be performed by March 31, 2021.</p> |
| <p>5. Unit 1 and Unit 2 New Construction Truss Design Code Conformance Items</p> <p>NextEra will revise the Point Beach Units 1 and 2 UFSAR to include the evaluation methods and acceptance criteria identified in the Table in response to RAI-1.a, in NextEra letter NRC 2018-0014, dated April 12, 2018. NextEra will revise the Point Beach Units 1 and 2 UFSAR to reclassify the construction truss as stated in its response to RAI-17 in NextEra letter NRC 2018-0014.</p> | <p>The UFSAR update will be implemented within 6 months of the output breaker closure from U1R40 completion.</p> |