



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

January 15, 2021

Mr. Don Moul
Executive Vice President, Nuclear
Division and Chief Nuclear Officer
Florida Power & Light Company
Mail Stop: EX/JB
700 Universe Blvd
Juno Beach, FL 33408

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 – AGING MANAGEMENT
AUDIT PLAN REGARDING THE SUBSEQUENT LICENSE RENEWAL
APPLICATION REVIEW

Dear Mr. Moul,

By letter dated November 16, 2020 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML20329A292), NextEra Energy Point Beach, LLC (NextEra) submitted an application for subsequent license renewal of Renewed Facility Operating License Nos. DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2 (Point Beach), to the U.S. Nuclear Regulatory Commission (NRC).

The NRC staff plans to conduct an Aging Management Audit from January 19 – March 26, 2021, in accordance with the enclosed regulatory audit plan. The Aging Management Audit will be conducted at NRC Headquarters to the greatest extent possible, due to the Coronavirus Disease 2019 public health emergency, and the Point Beach site.

If you have any questions on this matter, please contact Mr. Rogers by telephone at 301-415-2945 or via e-mail at Bill.Rogers@nrc.gov.

Sincerely,

/RA/

Lauren Gibson, Chief
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure:
Aging Management Audit Plan

cc w/encl: Listserv

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AUDIT PLAN REGARDING THE SUBSEQUENT LICENSE RENEWAL
APPLICATION REVIEW
DATED: JANUARY 15, 2021

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- TJones, OGC
- RSkokowski, OEDO
- MMcCoppin, OEDO
- SBurnell, HQ/OPA
- DMcIntyre, HQ/OPA
- CWolf, OCA
- LWilkins, OCA
- VMitlyng, RGN III/OPA
- PChandrathil, RGN III/OPA
- NFeliz-Adorno, RGN III
- RNg, RGN III
- William.Maher@fpl.com
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ADAMS Accession No. ML21007A260

***via e-mail**

NRR-106

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DATE	01/11/21	01/14/21	01/15/21

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**Audit Plan
Point Beach Nuclear Plant, Units 1 and 2
Subsequent License Renewal Application
Aging Management Regulatory Audit
January 19, 2021 – March 26, 2021**

**Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission**

Audit Plan
Point Beach Nuclear Plant, Units 1 and 2
Subsequent License Renewal Application
Aging Management Regulatory Audit

1. Background

By letter dated November 16, 2020 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML20329A292), NextEra Energy Point Beach, LLC (NextEra) submitted an application for subsequent license renewal of Renewed Facility Operating License Nos. DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2 (Point Beach), to the U.S. Nuclear Regulatory Commission (NRC).

The NRC staff will perform an aging management regulatory audit to gain a better understanding of (1) the applicant's methodology to identify the systems, structures, and components (SSCs) to be included within the scope of subsequent license renewal and subject to an aging management review (AMR), and (2) the applicant's aging management programs (AMPs), AMR items, time-limited aging analyses (TLAAs), and associated bases and documentation as applicable.

2. Regulatory Audit Bases

The staff performs its review to confirm that the information contained in the SLRA is in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." The staff performs its review in accordance with the guidance provided in NUREG-2192, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants," (SRP-SLR) and NUREG-2191, Rev. 0, "Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report," dated July 2017.

3. Regulatory Audit Scope of Review

Scoping and Screening Review

The purpose of the scoping and screening review is to evaluate the applicant's scoping and screening methodology used to identify SSCs within the scope of subsequent license renewal and subject to AMR, as well as the results of the implementation of the methodology. The review is performed by evaluating the scoping and screening process and results, as documented in the subsequent license renewal application, implementing procedures, reports, and drawings, such that the NRC staff:

- Obtains an understanding of the process used to identify the SSCs within the scope of license renewal and to identify the structures and components subject to an AMR; and
- Has sufficient docketed information to allow the NRC staff to reach a conclusion on the adequacy of the scoping and screening methodology and results, as documented in the subsequent license renewal application (SLRA)

AMP, AMR, and TLAA Review

The scope of the AMP, AMR, and TLAA review is to: (a) examine the applicant's AMPs, AMR items, and TLAAAs; (b) verify the applicant's claims of consistency with the corresponding GALL-SLR Report AMPs, and AMR items; and (c) assess the adequacy of the TLAAAs. Enhancements and exceptions will be evaluated on a case-by-case basis with the results documented in the safety evaluation report (SER).

The NRC staff will audit Program Elements 1 – 10 (scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions, confirmation process, administrative controls, and operating experience (OE)) of the AMPs against the elements of the associated AMP described in the GALL-SLR Report. In addition, the NRC staff will verify that the conditions at the plant are bounded by the conditions for which the GALL-SLR Report program was evaluated.

The NRC staff will also examine the applicant's program bases documents and related references for AMPs, AMR items, and TLAAAs, and interview applicant representatives to obtain additional clarification.

The NRC staff will use risk insights to inform the prioritization of its review of documentation associated with AMPs, AMR items, and TLAAAs and to focus the breadth and depth of its review of plant specific operating procedures and OE. However, the NRC staff's review is not limited to risk-significant systems and components because 10 CFR Part 54 is a deterministic rule and the NRC staff must conclude that there is reasonable assurance that activities will continue to be conducted in accordance with the current licensing basis and the effects of aging will be managed during the subsequent period of extended operation for all structures and components within the scope of 10 CFR Part 54.

The NRC staff will review the list of risk-significant systems and components provided by the applicant to inform the establishment of priorities for the performance of the scoping and screening review.

4. Audit Activities

The Aging Management Audit will consist of three parts, to be scheduled by the License Renewal Projects Branch (NLRP) safety project manager in coordination with the applicant. Following completion of the Aging Management Audit, an Aging Management Audit report will be issued.

The three Aging Management Audit parts include:

- Part #1 – In-Office Technical Review Audit
During the In-Office Technical Review Audit, technical staff will review the subsequent license renewal application (SLRA) and documentation on the applicant's electronic portal (ePortal). The staff will have the opportunity to have discipline-specific discussions with the applicant to gain context on the SLRA to support the staff's review.
- Part #2 – On-Site Audit
The On-Site Audit is performed, in part, by an integrated review team, which will include an OE review as well as staff observations of areas, equipment conditions, and

configurations, as needed. For additional information on whether activities will be performed on-site, see “On-Site Audit (Aging Management Audit Part #2),” below.

- Part #3 – In-Office Breakout Sessions

The In-Office Breakout Sessions will provide the opportunity for the technical staff to ask questions and have detailed technical discussions to identify and obtain information to complete the safety review.

Each of the three parts of the Aging Management Audit will provide the staff the opportunity to have technical discussions with the applicant to gain clarity and information regarding the SLRA. The audit is coordinated to support the development of the reviewers’ reasonable assurance for the safety finding to be documented in the SER. The staff may require additional information from the applicant for some technical areas, while finding that information on the ePortal is sufficient for other technical areas. Accordingly, some technical areas may not require inclusion in Part #2, the On-Site Audit, or Part #3, the In-Office Breakout Sessions, of the Aging Management Audit.

In-Office Technical Review Audit (Aging Management Audit Part #1)

The In-Office Technical Review Audit will precede the On-Site Audit (Aging Management Audit Part #2) and the In-Office Breakout Sessions (Aging Management Audit Part #3).

The purpose of the In-Office Technical Review Audit is for the staff to review the information contained in the SLRA and the applicant’s ePortal, including the license renewal drawings.

Using telecommunications, the in-office technical review portion of the Aging Management Audit also allows the applicant to provide context on the ePortal’s contents and configuration, the methods used to develop the SLRA, the corresponding results, and any areas unique to the Point Beach SLRA.

The staff will have the opportunity to have discipline-specific (e.g., structural or electrical) discussions with the applicant to discuss the approaches used for evaluation and development of AMPs, TLAAs, AMR items, with the consideration of OE. In addition, the staff may identify specific technical areas where the staff would benefit from a presentation or discussion to provide additional context to support the staff’s review. Such staff-identified technical areas should be initially discussed with the applicable technical branch chief.

The staff is to review the information needed to perform the safety review and use the information, to the extent possible, to begin developing draft input for the SER (resulting in an “SER with holes”).

During the In-Office Technical Review the staff should identify any areas requiring inclusion in the On-Site Audit, Part #2 of the Aging Management Audit. The identified areas may include OE that should be further considered or areas, equipment conditions, or configurations, which should be observed by the staff. The technical staff should coordinate this information at the technical branch level with their respective technical branch chief.

During the In-Office Technical Review Audit, the staff should identify to the technical branch chief and the NLRP safety project manager any areas that the reviewer has determined requires additional information and the recommendation as to whether this information should be pursued through the performance of the On-Site Audit or the In-Office Breakout Sessions.

The NLRP safety project manager will coordinate all communications with the applicant. Staff requests for communication with the applicant will require awareness and approval of their respective technical branch chief and the NLRP branch chief.

On-Site Audit (Aging Management Audit Part #2)

The purpose of the On-Site Audit is to perform a review of OE and for the staff to make visual observations of areas, equipment conditions, and configurations. Due to ongoing health guidelines related to travel and gatherings, the Point Beach On-Site Audit will be conducted using telecommunications to the maximum extent possible. Accordingly, the On-Site Audit will be performed as follows: Sections A(1) and A(2) will be performed using telecommunications with the participation of all technical reviewers. Sections A(3) and B will be performed using telecommunications or, as determined necessary to support the staff's review, by an integrated review team at the applicant's facility.

A. The staff will audit areas related to OE:

(1) Applicant's Process to Identify OE Used in Development of AMPs. The staff requests that the applicant provide a presentation on the process used to identify and evaluate the pertinent OE that was used to inform the development of the AMPs as discussed in the SLRA and basis documentation.

(2) Use of OE Contained in AMP Report-Out Documents. The staff requests that the applicant discuss how the OE contained in the AMP report-out documents (e.g., reports of inspections, assessments, AMP effectiveness reviews) is in alignment with information contained in the corrective action program (CAP) database and how the process described, along with the use of the report-out information, would include any pertinent OE otherwise contained in the CAP database. The applicant should demonstrate that OE identified by the process or included in the report-out documents is bounding of OE that should be considered for developing the SLRA. Additionally, the applicant should provide examples of the report-out documents and corresponding corrective action reports.

(3) Staff's Review of Age-Related OE Contained in the CAP Database. Following the applicant's presentations on the applicant's process to identify and evaluate OE and the information included in the report-out documents, the staff should determine if there are any specific areas of OE that have not been sufficiently addressed or if there is a need to sample the information discussed by the applicant to verify the applicant's results. If the staff identifies such a need, the staff should perform an independent review of age-related OE contained in the CAP database as necessary to provide reasonable assurance that the applicant has adequately identified and evaluated pertinent OE in the development of the SLRA.

B. The staff will perform necessary visual observations of areas, equipment conditions, and configurations, as previously approved by the technical branch chief as having an adequate basis for the need to perform such observations. The NLRP safety project manager shall provide the applicant the information on the areas, equipment conditions, and configurations prior to the On-Site Audit to ensure access and verify that licensee support is available.

In-Office Breakout Sessions (Aging Management Audit Part #3)

The In-Office Breakout Sessions will be performed using telecommunications and a schedule to be developed by the NLRP safety project manager along with applicant input, to allow for staff and applicant availability. The In-Office Breakout Sessions format includes: 1) sharing of technical questions by the NRC staff to the applicant, 2) a clarification call to provide clarity on the questions, and 3) a breakout session to have technical discussion on the questions.

The technical staff will inform the technical branch chief of the need for an In-Office Breakout Session. After the development of the questions for the In-Office Breakout Sessions, the technical staff will request approval of the questions prior to providing this information to the NLRP branch chief and NLRP safety project manager. In-Office Breakout Session topics and participants will be grouped by discipline, to the greatest and most efficient extent possible.

The In-Office Breakout Sessions topics will be sequenced, to the extent possible, in such a way as to address more complex areas early in the In-Office Breakout Sessions schedule. The sequencing is intended to allow for sufficient time to complete closeout discussions prior to the end of the In-Office Breakout Sessions schedule.

5. Information and Other Material Necessary for the Regulatory Audit

For the Aging Management Audit, the staff will review the subsequent license renewal application, as supplemented and revised, the AMP basis documents and other applicant supporting documents as appropriate and requested, which have been uploaded to the ePortal.

The staff may request additional applicant documents to be added to the ePortal during the course of the audit, as necessary. The staff requests for ePortal additions shall be made as needed to the NLRP safety project manager, who will provide the requests to the applicant.

The NRC staff will hold In-Office Breakout Sessions, using telecommunications, with applicant and site subject matter experts, to discuss various basis documents, references, condition/corrective action reports, and to obtain additional clarification related to the SLRA safety review.

In-Office Breakout Sessions for various technical review areas will occur at predesignated time slots, with pre-assigned NRC and applicant representatives. NRC staff will provide discussion topics and technical requests and questions to the NLRP safety project manager, who will then relay the information to the applicant at least a week before the In-Office Breakout Session. All In-Office Breakout Sessions will be coordinated via the NLRP safety project manager and the applicant.

6. Team Assignments

Team Member	Branch/Division
Naeem Iqbal	PRA Licensing B (APLB)/Division of Risk Assessment (DRA)
Robert Vettori	APLB/DRA
Duc Nguyen	Electrical Engineering, New Reactors, and License Renewal (EENB)/Division of Engineering and External Hazards (DEX)
Matthew McConnell	EENB/DEX
Mohammad Sadollah	EENB/DEX
Andrew Prinaris	Structural, Civil, Geotech Engineering (ESEB)/DEX
Bryce Lehman	ESEB/DEX
George Thomas	ESEB/DEX
George Wang	ESEB/DEX
Juan Lopez	ESEB/DEX
Luis Colin Fuentes	ESEB/DEX
Andrew Johnson	Corrosion and Steam Generator (NCSG)/New and Renewed Licenses (DNRL)
Brian Allik	NCSG/DNRL
Greg Makar	NCSG/DNRL
Jim Gavula	NCSG/DNRL
Leslie Terry	NCSG/DNRL
Lydiana Alvarado	NCSG/DNRL
Matt Yoder	NCSG/DNRL
Paul Klein	NCSG/DNRL
Tony Gardner	NCSG/DNRL
Ali Rezaei	Piping and Head Penetrations (NPHP)/DNRL
Austin Young	NPHP/DNRL
Bart Fu	NPHP/DNRL
Bob Davis	NPHP/DNRL
Eric Reichelt	NPHP/DNRL
Jay Collins	NPHP/DNRL
John Honcharik	NPHP/DNRL
Roger Kalikian	NPHP/DNRL
Seung Min	NPHP/DNRL
Carolyn Fairbanks	Vessels and Internals (NVIB)/DNRL
Ganesh Cheruvenki	NVIB/DNRL
David Dijamco	NVIB/DNRL
Jim Medoff	NVIB/DNRL
John Tsao	NVIB/DNRL
Joel Jenkins	NVIB/DNRL
On Yee	NVIB/DNRL

Nan Chien	Containment and Plant Systems (SCPB)/Division of Safety Systems (DSS)
Steve Jones	SPCB/DSS
Nageswara Karipineni	SCPB/DSS
Derek Scully	SCPB/DSS
Henry Wagage	SCPB/DSS
Fred Forsaty	Nuclear Systems Performance (SNSB)/DSS
Kevin Heller	Nuclear Methods and Fuels (SFNB)/DSS

7. Logistics

The Aging Management Audit will be conducted primarily using telecommunications from January 19, 2021, to March 26, 2021, with potentially a portion of the On-Site Audit (Aging Management Audit Part #2), as determined appropriate, conducted at the applicant's facility. Entrance and exit briefings will be held at the beginning and end of the audit via telecommunications. Status calls during the In-Office Audit will occur at least weekly but may be more if deemed necessary.

8. Special Requests

The NRC staff requests the applicant to make available the license renewal application program basis documentation and license renewal drawings, and other documents as requested.

9. Deliverables

An audit report should be issued to the applicant within 90 days from the end of the Aging Management Audit.