



November 4, 2021

L-2021-208
10 CFR 54.17

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
11545 Rockville Pike
One White Flint North
Rockville, MD 20852-2746

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

**SUBSEQUENT LICENSE RENEWAL APPLICATION - AGING MANAGEMENT REQUESTS FOR
ADDITIONAL INFORMATION (RAI) SET 9 RESPONSE SUPPLEMENT 1**

References:

1. NextEra Energy Point Beach, LLC (NEPB) Letter NRC 2020-0032 dated November 16, 2020, Application for Subsequent Renewed Facility Operating Licenses (ADAMS Package Accession No. ML20329A292)
2. NRC Public Meeting with NextEra Energy to Discuss Point Beach Nuclear Plant Units 1 and 2, Subsequent License Renewal Application – Proposed Aging Management Programs, October 19, 2021 (ADAMS Accession No. ML21281A077)
3. NEPB Letter L-2021-174 dated October 1, 2021, Subsequent License Renewal Application - Aging Management Request for Additional Information (RAI) Set 9 Response (ADAMS Accession No. ML21274A053)

NEPB, owner and licensee for Point Beach Nuclear Plant (PBN) Units 1 and 2, has submitted a subsequent license renewal application (SLRA) for the Facility Operating Licenses for PBN Units 1 and 2 (Reference 1). Based on the public meeting between the NRC and NEPB (Reference 2), NEPB is providing the attached information supplementing Attachment 1 of Reference 3.

For ease of reference, the index of attached information is provided on page 3 of this letter. Attachments may include associated revisions to the SLRA (Enclosure 3 Attachment 1 of Reference 1) denoted by ~~strikethrough~~ (deletion) and/or **bold red underline** (insertion) text. Any previous SLRA revisions are denoted by **bold black** text, and SLRA table revisions are included as excerpts from each affected table.

Should you have any questions regarding this submittal, please contact me at (561) 304-6256 or William.Maher@fpl.com.

NextEra Energy Point Beach, LLC

6610 Nuclear Road, Two Rivers, WI 54241

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

Executed on the 4th day of November 2021.

Sincerely,
William
Maher

Digitally signed by William Maher
DN: cn=William Maher, o=Nuclear,
c=US, email=william.maher@fpl.com, c=US
Date: 2021.11.04 09:43:21 -0400

William D. Maher
Licensing Director - Nuclear Licensing Projects

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

Attachments Index		
Attachment No.	RAI No.	Subject
1	B.2.3.27-1a	Cathodic Protection for Buried Steel Piping/Preventive Action Category E

NEPB Supplemental Response to RAI B.2.3.27-1a:

Based on the public meeting conducted between NEPB and NRC on October 19, 2021 (Reference 1), the following information supplements the NEPB response in Attachment 1 of Reference 2.

A review of the fuel oil and service water buried steel piping was performed in order to determine what percentage of that piping would be considered to have cathodic protection coverage. The results of that review are presented below:

System	Approximate length of in-scope buried steel piping (linear-feet)	Approximate length of in-scope buried steel piping covered by the cathodic protection system (linear-feet)
Fuel Oil	3305	1500
Service Water	325	151

Based on the above, approximately 45% of the buried fuel oil piping within the scope of SLR can be considered to have cathodic protection coverage. Of the buried service water piping within the scope of SLR, approximately 46% can be considered to have cathodic protection coverage. Overall, 45% of the combined buried fuel oil and service water piping can be considered to have cathodic protection coverage.

Reference 2 provided PBN's justification for why additional cathodic protection was not necessary based on excellent operating experience associated with buried steel piping, including the non-cathodically protected piping, and soil conditions considered non-aggressive based on sampling. Thus, PBN considers that the in SLR scope buried steel piping at the site appropriately meets the Preventive Action Category E classification per NUREG-2191, Table XI.M41-2. During the Reference 1 meeting, however, the NRC staff indicated that it was not its intent that Preventive Action Category E be used where cathodic protection only provided partial coverage.

Accordingly, for the Buried and Underground Piping and Tanks AMP, PBN proposes to proceed with the number of piping inspections in each ten-year interval, beginning in the ten-year period prior to the SPEO, through the SPEO based on Preventive Action Category E in NUREG-2191, Table XI.M41-2. However, PBN will take an exception to the guidance for Preventive Action Category E that all buried steel piping have some level of cathodic protection. The justification for this exception is the excellent PBN operating experience associated with buried steel piping, including the non-cathodically protected piping, and soil conditions considered non-aggressive based on sampling (Reference 2). Furthermore, PBN has also committed to performing two additional inspections of buried fire protection piping in each ten-year interval, beginning in the ten-year period prior to the SPEO, through the SPEO beyond that recommended by Preventive Action Category E (Reference 3). Finally, as an additional measure, PBN

commits to performing at least three inspections of the non-cathodically protected steel piping as part of the five inspections recommended by Preventive Action Category E for PBN in each ten-year interval, beginning in the ten-year period prior to the SPEO, through the SPEO.

The SLRA is revised as noted below.

References:

1. NRC Public Meeting with NextEra Energy to Discuss Point Beach Nuclear Plant, Units 1 and 2, Subsequent License Renewal Application – Proposed Aging Management Programs, October 19, 2021 (ADAMS Accession No. ML21281A077)
2. NextEra Energy Point Beach, LLC (NEPB) Letter to NRC L-2021-174 dated October 1, 2021, Subsequent License Renewal Application – Aging Management Request for Additional Information (RAI) Set 9 Response (ADAMS Accession No. ML21274A053)
3. NextEra Energy Point Beach, LLC (NEPB) Letter to NRC L-2021-144 dated August 11, 2021, Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 2 Responses (ADAMS Accession No. ML21223A308)

Associated SLRA Revisions:

SLRA Appendix A, Section 16.4, Table 16-3 (Item 31), page A-100, as revised by SLRA Aging Management Supplement 1 and Reference 3, is amended as follows:

**Table 16-3
 List of SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
			<p>x) <u>Perform inspections on the uncoated/unwrapped portions of the buried fire protection system piping no earlier than 10 years prior to the SPEO and at least every 10 years during the SPEO. The inspections include at least two 10-ft segments of uncoated/unwrapped fire protection piping.</u></p> <p>y) <u>Perform at least 3 inspections of non-cathodically protected steel piping as part of the 5 preventive action category E inspections performed in each 10 year interval beginning no earlier than 10 years prior to the SPEO and at least every 10 years during the SPEO.</u></p>	

SLRA Appendix B, Section B.2.3.27, page B-196, is amended as follows:

Exception to NUREG-2191

- The PBN cathodic protection was last evaluated in accordance with NACE SP0169-2013 rather than NACE SP0169-2007 specified in GALL-SLR. The PBN Buried and Underground Piping and Tanks AMP will take an exception to performing cathodic protection testing and evaluations in accordance with all of NACE SP0169-2007. Instead, the cathodic protection testing and evaluations shall be performed in accordance with NACE SP0169-2013 (with the exception of Section 6, "Criteria and Other Considerations for Cathodic Protection"). The information from NACE SP0169-2007 will be used instead of NACE SP0169-2013 for Section 6. Per LR-ISG-2015-01, the NRC disagreed with portions of NACE SP0169-2013, Section 6.
- PBN will take an exception to the guidance for Preventive Action Category E that all buried steel piping have some level of cathodic protection. The justification for this exception is the excellent PBN operating experience associated with buried steel piping, including the non-cathodically protected piping, and soil conditions considered non-aggressive based on sampling. Additional justification is that PBN has also committed to performing two inspections of buried fire protection piping in each ten-year interval, beginning in the ten-year period prior to the SPEO, through the SPEO beyond that recommended by Preventive Action Category E. Finally, as an additional measure, PBN commits to performing at least three inspections of the non-cathodically protected steel piping as part of the five inspections recommended by Preventive Action Category E for PBN in each ten-year interval, beginning in the ten-year period prior to the SPEO, through the SPEO.

SLRA Appendix B, Section B.2.3.27, page B-197, as revised by SLRA Aging Management Supplement 1 and Reference 3, is amended as follows:

Element Affected	Enhancement
4. Detection of Aging Effects	<ul style="list-style-type: none"><li data-bbox="570 443 1388 636">● <u>Clarify that inspections will be performed on the uncoated/unwrapped portions of the buried fire protection system piping no earlier than 10 years prior to the SPEO and at least every 10 years during the SPEO. The inspections include at least two 10-ft segments of uncoated/unwrapped fire protection piping.</u><li data-bbox="570 636 1388 798">● <u>Perform at least 3 inspections of non-cathodically protected steel piping as part of the 5 preventive action category E inspections performed in each 10 year interval beginning no earlier than 10 years prior to the SPEO and at least every 10 years during the SPEO.</u>

Associated Enclosures:

None.