

**POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 (PBN)
SUBSEQUENT LICENSE RENEWAL APPLICATION (SLRA)
REQUEST FOR ADDITIONAL INFORMATION (RAI)
SAFETY - SET 14**

**SLRA Section 3.3.2.2.8, “Cracking Due to Stress Corrosion Cracking
in Aluminum Alloys”**

RAI 3.3.2.2.8-2

Regulatory Basis

Section 54.21(a)(3) of Title 10 of the *Code of Federal Regulations* (10 CFR) requires an applicant to demonstrate that the effects of aging for structures and components will be adequately managed so that the intended function(s) will be maintained consistent with the current licensing basis for the period of extended operation. One of the findings that the U.S. Nuclear Regulatory Commission (NRC) staff must make to issue a renewed license (10 CFR 54.29(a)) is that actions have been identified and have been or will be taken with respect to managing the effects of aging during the period of extended operation on the functionality of structures and components that have been identified to require review under 10 CFR 54.21, such that there is reasonable assurance that the activities authorized by the renewed license will continue to be conducted in accordance with the current licensing basis. In order to complete its review and enable making a finding under 10 CFR 54.29(a), the staff requires additional information in regard to the matters described below.

Background

NextEra submitted an annual update to the Point Beach SLRA by letter dated November 30, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21334A293). The update included revisions to SLRA Table 3.3.2-15, “Plant Air – Summary of Aging Management Evaluation,” which added aging management items for loss of material of aluminum valve bodies exposed internally to dry air (GALL-SLR item 3.3-1, 235) and loss of material and cracking of insulated aluminum valve bodies exposed externally to uncontrolled indoor air (GALL-SLR items 3.3-1, 245 and 3.3-1, 233, respectively).

Issue

GALL-SLR item 3.3-1, 233 was omitted from SLRA Table 3.3-1, but NextEra stated in the response to RAI 3.3.2.2.8-1 (ADAMS Accession No. ML21242A230) that this item is not applicable because there are no insulated aluminum piping, piping components, or tanks exposed to air or condensation in the Auxiliary Systems. For GALL-SLR item 3.3-1, 245, SLRA

Table 3.3-1 states that it is not applicable because there are no insulated aluminum piping, piping components, or tanks in the Auxiliary Systems. Since the annual update states that GALL-SLR items 3.3-1, 233 and 3.3-1, 245 are now applicable for Point Beach SLR, SLRA Table 3.3-1 states that these items require further evaluation in SLRA Sections 3.3.2.2.8 and 3.3.2.2.10, respectively. The annual update did not include any other revisions to the SLRA to indicate that these items are now considered applicable for SLRA and have been evaluated in Sections 3.3.2.2.8 and 3.3.2.2.10. Consequently, the annual update is inconsistent with the SLRA and the response to RAI 3.3.2.2.8-1 with respect to the Table 3.3-1 discussions for GALL-SLR items 3.3-1, 233 and 3.3-1, 245.

Request

Provide a basis for not updating the discussions of GALL-SLR items 3.3-1, 233 and 3.3-1, 245 in SLRA Table 3.3-1 and for not updating SLRA Sections 3.3.2.2.8 and 3.3.2.2.10 to evaluate these GALL-SLR items. Alternatively, revise SLRA Table 3.3-1 to indicate that GALL-SLR items 3.3-1, 233 and 3.3-1, 245 are applicable and revise SLRA Sections 3.3.2.2.8 and 3.3.2.2.10 to evaluate these GALL-SLR items.