



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

June 27, 2022

Mr. Bob Coffey  
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, UNIT NOS. 1 AND 2 – SUPPLEMENTAL  
INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING  
ACTION RE: AMENDMENT REQUEST TO ADOPT TSTF-505 “PROVIDE RISK  
INFORMED EXTENDED COMPLETE TIMES – RITSTF INITIATIVE 4B”  
(EPID L-2022-LLA-0074)

Dear Mr. Coffey:

By letter dated May 20, 2022, NextEra Energy Point Beach, LLC, (NextEra) submitted a license amendment request for Point Beach Nuclear Plant, Units 1 and 2 (Point Beach). The proposed amendment would modify the Point Beach Technical Specifications (TSs) to permit the use of Risk Informed Completion Times in accordance with Technical Specification Task Force (TSTF) Traveler TSTF-505, Revision 2, “Provide Risk-Informed Extend Completion Times - RITSTF Initiative 4b.” The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff’s acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the TSs) [or construction permit] must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements for the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that NextEra supplement the application to address the information requested in the enclosure by July 18, 2022. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with Jarrett Mack of your staff on June 27, 2022.

If you have any questions, please contact the Point Beach Project Manager, Robert Kuntz, at (301) 415-3733.

Sincerely,

**/RA/**

Robert F. Kuntz, Senior Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure:  
Supplemental Information Needed

cc: Listserv

SUPPLEMENTAL INFORMATION NEEDED

AMENDMENT REQUEST TO ADOPT TSTF-505, REVISION 2,

“PROVIDE RISK-INFORMED EXTEND COMPLETION TIMES - RITSTF INITIATIVE 4b”

NEXTERA ENERGY POINT BEACH, LLC

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-266 AND 50-301

1. Section 3.2 of Nuclear Energy Institute (NEI) 06-09A (Agencywide Documents Access Management System (ADAMS) Accession No. ML12286A322) discusses scope of the probability risk analysis (PRA). It states that other sources of risk (i.e., seismic, other external events) must be quantitatively assessed if they contribute significantly to configuration-specific risk. It also states that consideration is made of both core damage frequency (CDF) and large early release frequency (LERF) metrics. Bounding analyses or other conservative quantitative evaluations are permitted where realistic PRA models are unavailable.

The discussion in section 2 of Enclosure 4 to the license amendment request (LAR) (ML22140A131) provides unclear and potentially contradictory information about consideration of seismic risk in the risk-informed completion time (RICT) calculations. Section 2 of Enclosure 4 to the LAR states that seismic risk is addressed for risk-managed technical specifications using a bounding seismic “adder.” However, it is unclear to the U.S. Nuclear Regulatory Commission (NRC) staff whether this is the seismic penalty approach or something different. In addition, information is not provided explaining this approach, how it was developed, and how it will be used in the application (specifically, if it is added to each proposed RICT).

The discussion in section 2 of Enclosure 4 to the LAR appears to indicate that the contribution of seismic risk is insignificant. Not considering seismic risk in the RICT calculations would constitute a deviation from NEI 06-09-A and the licensee’s discussion during the pre-submittal meeting on September 16, 2021 (see slide 7 of ML21253A015). If the licensee is deviating from NEI 06-09-A, the LAR does not provide sufficient information, referring instead to Electric Power Research Institute (EPRI) report 3002020744, “Investigation of Seismic Probabilistic Risk Assessment (SPRA) Quantification to Simplify PRA Models Used to Assess Risk-Informed Completion Times.” This report was not included as part of the LAR and has not been submitted by the licensee on the docket to support this application. This report is not publicly available and the NRC staff has neither reviewed nor endorsed the report in the past. Therefore, the NRC staff does not have the ability to review the basis if the licensee is deviating from endorsed guidance and precedent.

Therefore, the LAR is unclear about the approach that the licensee proposes to use for consideration of seismic risk in the RICT application (seismic penalty or “adder” or not including seismic risk). Further, insufficient information is provided in the LAR for any approach proposed by the licensee.

Request:

- a) Provide, with justification, the seismic CDF and seismic LERF penalty factors that will be added to each proposed RICT, consistent with NEI 06-09-A. If necessary, provide any changes to the information in the LAR that are impacted by the response to this item. OR
  - b) Provide a detailed technical justification for deviating from NEI-06-09-A on the consideration of seismic risk in the proposed RICTs (i.e., from the seismic penalty approach). The justification should include the basis for applicability of the approach for implementation of a RICT at Point Beach. If the justification for deviating from NEI-06-09-A is EPRI report 3002020744, include the report for NRC staff review.
2. Attachment 1 of the LAR related to Technical Specifications Task Force (TSTF) Traveler TSTF-439 "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO [limiting condition for operation]" (ML060120272), states:

Several Point Beach Required Actions include "second" CTs that are proposed for removal. Historically, second CTs were imposed for certain Required Actions to establish a limit on the maximum allowable time for any combination of Conditions that would result in continuous failure to meet an LCO. TSTF-439-A, Revision 2 (Reference 5.8), removed the second CTs [completion times] from the STS [standard technical specifications] of NUREG 1431. In approving the TSTF, the NRC Staff noted that second CTs complicate the implementation of RICT Program, and that the TS controls coupled with licensee configuration risk management programs provide adequate assurance against inappropriate use of combinations of Conditions that result in a single contiguous occurrence of failing to meet the LCO. Resolving these plant-specific variations by removal of the second CTs where inconsistent with the Required Actions of TSTF-505, Revision 2, does not affect the applicability of TSTF-505, Revision 2, or the NRC's model safety evaluation....

TSTF-439 discusses the Maintenance Rule and the Reactor Oversight Process as two programs which would provide a strong disincentive to continued operation with concurrent multiple inoperabilities of the type the second CTs were designed to prevent.

In addition to these programs, TSTF-439 added a requirement to section 1.3 of the TSs to require administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls should consider plant risk and shall limit the maximum contiguous time of failing to meet the LCO. This TS requirement, when considered with the regulatory processes discussed above, provide an equivalent or superior level of plant safety without the unnecessary complication of the TSs by second CTs on some specifications.

Request: Provide the plant-specific TS controls as well as the configuration risk management programs to support removal of the proposed second CTs.

SUBJECT: POINT BEACH NUCLEAR PLANT, UNIT NOS. 1 AND 2 – SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION RE: AMENDMENT REQUEST TO ADOPT TSTF-505 “PROVIDE RISK INFORMED EXTENDED COMPLETE TIMES – RITSTF INITIATIVE 4B” (EPID L-2022-LLA-0074) DATED JUNE 27, 2022

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| NAME   | RKuntz                  | SRohrer              | SVasavada (A)    |
| DATE   | 6/17/2022               | 6/22/2022            | 6/22/2022        |
| OFFICE | DSS/DSS/STSB            | NRR/DORL/LPL3/BC     | NRR/DORL/LPL3/PM |
| NAME   | VCusumano (RGrover for) | NSalgado (SWall for) | RKuntz           |
| DATE   | 6/27/2022               | 6/17/2022            | 6/27/2022        |

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