



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

August, 11, 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, UNITS 1 AND 2 – REGULATORY AUDIT IN
SUPPORT OF REVIEW OF THE APPLICATION TO ADOPT RISK-INFORMED
EXTENDED COMPLETION TIMES – RITSTF INITIATIVE 4B
(EPID L-2022-LLA-0074)

Dear Mr. Coffey:

By letter dated May 20, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22140A131), as supplemented by letter dated July 11, 2022 (ML22192A152), NextEra Energy Point Beach, LLC (the licensee) submitted a license amendment request (LAR) for Point Beach Nuclear Plant, Units 1 and 2 (Point Beach). The proposed LAR would modify the plant's Technical Specifications 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 Extended Completion Times - RITSTF [Risk-Informed Technical Specification Task Force] Initiative 4b."

The U.S. Nuclear Regulatory Commission (NRC) staff has found the need for a regulatory audit to examine the licensee's non-docketed information with the intent to gain understanding, to verify information, or to identify information that requires docketing to support the basis of the licensing or regulatory decision.

The NRC staff will conduct the audit virtually via Teams using a licensee-established electronic portal available to NRC staff from approximately August 22, 2022, through December 16, 2022, with formal audit meetings to be scheduled during this period as needed. The detailed audit plan is enclosed with this letter.

B. Coffey

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If you have any questions, please contact me at (301) 415-2855 or by e-mail at Scott.Wall@nrc.gov.

Sincerely,

/RA/

Scott Wall, 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:
Audit Plan

cc: Listserv

REGULATORY AUDIT PLAN
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
TO SUPPORT THE REVIEW OF THE LICENSE AMENDMENT REQUEST
TO ADOPT RISK-INFORMED COMPLETION TIMES
NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 50-266 AND 50-301

1.0 BACKGROUND

By letter dated May 20, 2022 (Reference 1), as supplemented by letter dated July 11, 2022, (Reference 2) NextEra Energy Point Beach, LLC (the licensee) submitted a license amendment request (LAR) to amend Renewed Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2 (Point Beach). The proposed LAR would modify the plant's Technical Specifications (TSs) to allow the use of risk-informed completion times (RICTs) in accordance with Technical Specification Task Force (TSTF) Traveler TSTF-505, Revision 2, "Provide Risk-informed Extended Completion Times, RITSTF [Risk-Informed Technical Specification Task Force] Initiative 4b" (Reference 3). These RICTs would apply to certain actions required when limiting conditions for operation are not met.

The staff from the Nuclear Regulatory Commission's (NRC) Office of Nuclear Reactor Regulation (NRR) has initiated its review of the LAR in accordance with NRR Office Instruction LIC-101, "License Amendment Review Procedures" (Reference 4).

2.0 REGULATORY AUDIT BASIS

A regulatory audit is a planned license- or regulation-related activity that includes the examination and evaluation of primarily non-docketed information associated with the LAR. An audit is conducted to gain understanding, to verify information, and to identify information that will require docketing to support the basis of a licensing or regulatory decision. An audit will assist the NRC staff in efficiently conducting its review and gaining insights to the licensee's processes and procedures. Information that the NRC staff relies upon to make the safety determination must be submitted on the docket. This audit will be conducted in accordance with NRR Office Instruction LIC-111, "Regulatory Audits" Revision 1, dated October 2019 (Reference 5), with exceptions noted within this audit plan.

The NRC staff performs the audit to support its evaluation of whether the licensee's LAR can be approved per Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.90, "Application for amendment of license, construction permit, or early site permit." The NRC staff's review will be informed by NUREG-0800, Standard Review Plan Section 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis" (Reference 6). The audit will assist the NRC staff with understanding the licensee's proposed program to implement RICTs for certain TSs.

Enclosure

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

NRC's objectives of the audit are the following:

- Learn how the licensee's proposed program implements TSTF-505 and conforms to NRC-endorsed guidance in Nuclear Energy Institute (NEI) report NEI 06-09, Revision 0-A, "Risk-Informed Technical Specification Initiative 4b, Risk-Managed Technical Specification Guidelines" (Reference 7).
- Gain a better understanding of the detailed calculations, analyses, and bases underlying the LAR and confirm the staff's understanding of the LAR.
- Gain a better understanding of plant design features and their implications for the LAR.
- Identify any information needed to enable the staff's evaluation of the technical acceptability of the probabilistic risk assessment (PRA) used for this application.
- Identify any information needed to enable the NRC staff's evaluation of whether the proposed changes challenge design-basis functions or adversely affect the capability or capacity of plant equipment to perform design-basis functions.
- Identify questions and requests that may become formal requests for additional information (RAIs) per NRR Office Instruction LIC-115, "Processing Requests for Additional Information" (Reference 8).

The NRC staff will audit the PRA methods that the licensee would use to determine the risk impact from which the revised completion times would be obtained, including the licensee's assessments of internal events (including internal flooding), fire, and seismic PRAs. The NRC will also audit the licensee's assessment of risk from other external events, and the licensee's evaluation of defense-in-depth.

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE AUDIT

The NRC staff requests information and audit meeting(s) throughout the audit period. The NRC staff uses an "audit items list" to identify the information (e.g., methodology, process information, and calculations) to be audited. The NRC staff provides the final audit items list as an enclosure to the audit summary report, which will be publicly available. The attachment to this audit plan includes the initial audit items list. Throughout the audit period, the NRC staff provides the licensee with audit questions and audit-related requests so that the licensee can better prepare for audit discussions with NRC staff. Any information accessed through the licensee's portal is not held or retained in any way by NRC staff. The NRC staff requests the licensee to have the requested audit information listed in the audit items list to be readily available and accessible for the NRC staff's review via a Web-based portal.

5.0 TEAM ASSIGNMENTS

The audit team will consist of the following NRC staff from NRR and contractors.

- Scott Wall, Plant Licensing Branch III (LPL3)
- Jonathan Evans, PRA Licensing Branch A (APLA)
- Kristy Bucholtz, APLA
- Jigar Patel, APLA
- De Wu, PRA Licensing Branch C (APLC)
- Sunwoo Park, APLC
- Andrea Russell, Technical Specifications Branch (STSB)

- Nageswara Karipineni, Containment and Plant Systems Branch (SCPB)
- David Nold, SCPB
- Calvin Cheung, Instrumentation and Controls Branch B (EICB)
- Norbert Carte, EICB
- Edmund Kleeh, Electrical Engineering Branch (EEEB)
- Steve Wyman, EEEB
- Charley Peabody, Nuclear Systems Performance Branch (SNSB)
- Santosh Bhatt, SNSB
- To be determined, Pacific Northwest National Laboratory (PNNL)
- To be determined, PNNL

The NRC staff may request access for additional staff as the audit progresses.

6.0 LOGISTICS

To support the review schedule communicated to the licensee when the NRC staff accepted the LAR for technical review, audit activities will be performed remotely and virtually using Microsoft Teams, teleconference, and a Web-based portal or other virtual meeting space created by the licensee. NRC information requests and communications with licensee staff is coordinated through the NRC's licensing project manager.

A desktop audit will take place between August 22, 2022 and December 16, 2022. The NRC's licensing project manager informs the licensee of the entrance and exit meeting dates when they are established. The NRC intends to set up audit meeting(s) (e.g., a single, multi-day audit meeting; periodic audit meetings throughout the audit period) on mutually agreeable dates and times (to be determined) to discuss information needs and questions arising from the NRC's review of the audited items. The NRC staff may change and/or add audit dates and times when deemed necessary. Audit meeting agenda and questions will be sent in advance of the audit meeting.

The NRC staff requests the licensee to have the information referenced in Section 4.0 of this audit plan available and accessible for the NRC staff's review via an internet-based portal within 2 weeks of the date of this audit plan. The NRC staff requests that any supplemental information requested be available and accessible for the NRC staff's review within 1 week of the date of the NRC's notification to the licensee of the new requests. The NRC's licensing project manager informs the licensee via routine communications when the NRC staff no longer needs access to the portal. The NRC staff requests the licensee to notify the NRC licensing project manager when an audit item is added to its portal by sending an e-mail to the NRC licensing project manager.

7.0 SPECIAL REQUESTS

The NRC requests access to requested documents and information through a Web-based portal that allows the NRC staff and contractors to access documents over the Internet. The following conditions associated with the online portal must be maintained while the NRC staff and contractors have access to the online portal:

- The online portal will be password protected. A separate password will be assigned to each member of the NRC staff and NRC contractors taking part in the audit.

- The online portal will prevent the NRC participants from printing, saving, downloading, or collecting any information directly from the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgment by each user.

Username and password and/or other Web-based portal access information should be provided directly to members of the NRC staff and contractors as needed. The NRC licensing project manager will provide the licensee with names and contact information of the NRC staff and contractors participating in the audit. All other communications should be coordinated through the NRC project manager.

8.0 DELIVERABLES

The NRC staff will develop any RAIs, as needed, via NRR Office Instruction LIC-115 and issue such RAIs separately from audit-related correspondence. The NRC staff will issue an audit summary report prior to completing its review of the LAR.

9.0 REFERENCES

1. Letter from Michael Strobe to the U.S. Nuclear Regulatory Commission, "License Amendment Request 297, Revise Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 2, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b,'" May 20, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession Package No. ML22140A132).
2. Letter from Dianne Strand to the U.S. Nuclear Regulatory Commission, "Response to Request for Supplemental Information (RSI) Regarding License Amendment Request (LAR) 297, Revise Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 2, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b,'" July 11, 2022 (ML22192A152).
3. TSTF-505, Revision 2, "TSTF Comments on Draft Safety Evaluation for Traveler TSTF-505, 'Provide Risk-Informed Extended Completion Times,' and Submittal of TSTF-505, Revision 2," July 2, 2018 (ML18183A493).
4. U.S. Nuclear Regulatory Commission, NRR Office Instruction LIC-101, Revision 6, "License Amendment Review Procedures," July 31, 2020 (ML19248C539).
5. U.S. Nuclear Regulatory Commission, NRR Office Instruction LIC-111, Revision 1, "Regulatory Audits," October 31, 2019 (ML19226A274).
6. U.S. Nuclear Regulatory Commission, NUREG-0800, "Standard Review Plan," Section 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis: General Guidance," June 2007 (ML071700658).
7. Nuclear Energy Institute, NEI 06-09, Revision 0-A, "Risk-Informed Technical Specification Initiative 4b, Risk-Managed Technical Specification Guidelines," November 2006 (ML12286A322).
8. U.S. Nuclear Regulatory Commission, NRR Office Instruction LIC-115, Revision 1, "Processing Requests for Additional Information," August 9, 2021 (ML21141A238).

Initial Audit Items List

Item #	Audit Item
1	Reports of full-scope and focused-scope peer reviews, facts and observations (F&Os) closure reviews, and any self-assessments referred to in the license amendment request (LAR) for the internal events, internal flooding, fire, and seismic probabilistic risk assessments (PRAs) cited in the LAR.
2	<p>For the internal events, internal flooding, fire, and seismic PRAs, plant-specific documentation (e.g., uncertainty notebooks) related to:</p> <ul style="list-style-type: none"> a. The review of the PRA model assumptions and sources of uncertainty (generic and plant-specific assumptions/uncertainties) b. Identification of key assumptions and sources of uncertainty for this LAR c. Parametric uncertainty and state-of-knowledge correlation evaluation
3	PRA notebooks for the modeling of FLEX equipment and FLEX human error probabilities credited in the PRAs.
4	PRA notebook(s) on the modeling of digital control systems, including basis for the representative failure probabilities.
5	Documentation of how shared or cross-tied systems are modeled in the PRA.
6	Fire PRA notebooks containing the results of the fire PRA.
7	Primary fire PRA notebooks (for example, Fire Modeling Notebook, Main Control Board Analysis Notebook, Circuit Failure Mode Likelihood Analysis Notebook) that address the major elements of the fire PRA and the methods used in those elements.
8	<p>Additional documentation that supports the seismic PRA and external events screening, including:</p> <ul style="list-style-type: none"> • Calculations of seismic core damage frequency (SCDF) and seismic large early release frequency (SLERF) for RICT program, including all input parameters and their justification of use. • Evaluation of seismic-induced loss of offsite power (LOOP) and its impact on RICT program. • Reports related to external flooding impact on Point Beach site, and evaluation of its impact on RICT program • Reports related to high winds and tornado impact on Point Beach site, tornado/wind generated missile vulnerability evaluation, tornado missile protection structural barriers, and evaluation of tornado missile barriers for RICT program.
9	If modeled, the PRA notebooks associated with the modeling of Open Phase Condition (OPC) in electrical switchyards and the Open Phase Isolation System (OPIS).
10	Documentation supporting the development of the real-time risk tool and benchmarking it against the PRA.

Item #	Audit Item
11	Documentation supporting the example risk-informed completion times (RICT) calculations presented in LAR Enclosure 1, Table E1-2.
12	PRA configuration control and update procedures, including when the PRA is updated (i.e., unscheduled and scheduled PRA updates).
13	Final RICT program procedures (e.g., for risk management actions, PRA functionality determination, and recording limiting conditions for operation). [The licensee may choose (optional) to provide draft RICT program procedures if final procedures are not available.]
14	<p>Relevant design documentation (e.g., piping and instrumentation diagrams):</p> <ul style="list-style-type: none">• Documentation to support LAR Enclosure 1, Table E1-3(1) and Table E1-3(2) showing each primary transient/accident and the specific diverse actuation functions which support it.
15	Other documentation that the licensee determines to be responsive to the staff's information requests.
16	<p>Design documentation of major electrical SSCs to facilitate better audit discussions:</p> <ul style="list-style-type: none">• Simplified one-line diagrams for AC and DC power distribution systems including 120 Vac system for uninterruptible power for plant protection systems (Please ensure the diagrams are clear and readable).• Information on diesel generators (DGs)- total loads and shared supporting systems and also minimum DGs required for each unit and for station for shutdown).• Load list(s) only for Class 1E buses for AC and DC systems for response to LOCA and LOOP.• Identify any buses, loads, and other equipment shared in the AC and DC distribution systems for DBAs.• For offsite power system – normal lineup for startup and shutdown and any alternate lineups.• Procedures for loss of one Class 1E AC bus, and also for one Class 1E DC bus.

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DATE	8/8/2022	8/8/2022	8/8/2022	8/8/2022
OFFICE	NRR/DSS/SCPB/BC	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM	
NAME	BWittick	NSalgado	SWall	
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