



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

September 30, 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 LICENSE AMENDMENT REQUEST REGARDING
RISK-INFORMED APPROACH FOR CLOSURE OF GENERIC SAFETY
ISSUE-191 (EPID L-2022-LLA-0106)

Dear Mr. Coffey:

By letter dated July 29, 2022 (Agencywide Documents Access and Management System Accession No. ML22210A086), NextEra Energy Point Beach, LLC (NextEra, the licensee) submitted license amendment and exemption requests for Point Beach Nuclear Plant, Units 1 and 2 (Point Beach). The proposed amendments would revise the licensing basis described in the Point Beach Updated Final Safety Analysis Report (UFSAR) to include a risk-informed method of evaluating the effects of loss of cooling accident (LOCA) generated debris on long-term core cooling (LTCC). The requested exemption would allow the use of risk-informed methods to evaluate the LTCC effects of debris generation resulting from a postulated LOCA in order to address the safety issues described in Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors." The proposed license amendments and exemption requests are part of NextEra's final resolution to Generic Safety Issue (GSI-191), "Assessment of Debris Accumulation on Pressurized-Water Reactor Sump and Performance," and for responding to GL 2004-02.

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 October 10, 2022, through February 24, 2023, 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
REGARDING RISK-INFORMED APPROACH
FOR CLOSURE OF GENERIC SAFETY ISSUE-191
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 July 29, 2022 (Agencywide Documents Access and Management System Accession No. ML22210A086), NextEra Energy Point Beach, LLC (NextEra, the licensee) submitted license amendment and exemption requests for Point Beach Nuclear Plant, Units 1 and 2 (Point Beach). The proposed amendments would revise the licensing basis described in the Point Beach Updated Final Safety Analysis Report (UFSAR) to include a risk-informed method of evaluating the effects of loss of cooling accident (LOCA) generated debris on long-term core cooling (LTCC). The requested exemption would allow the use of risk-informed methods to evaluate the LTCC effects of debris generation resulting from a postulated LOCA in order to address the safety issues described in Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors" (ML042360586). The proposed license amendments and exemption requests are part of NextEra's final resolution to addressing the concerns of Generic Safety Issue (GSI-191), "Assessment of Debris Accumulation on Pressurized-Water Reactor Sump and Performance," and for responding to GL 2004-02.

The staff from the Nuclear Regulatory Commission's (NRC) Office of Nuclear Reactor Regulation (NRR) has initiated its review of the license amendment request (LAR) in accordance with NRR Office Instruction LIC-101, "License Amendment Review Procedures," Revision 6, dated July 31, 2020 (ML19248C539).

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 (ML19226A274), 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 audit will assist the NRC staff with understanding the licensee's approach described in the application, as supplemented, including use of NRC staff guidance applicable to the resolution of GL 2004-02.

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

NRC's objectives of the audit are the following:

- 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," Revision 1, dated August 9, 2021 (ML21141A238).

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)
- Andrea Russell, Technical Specifications Branch (STSB)
- Steve Smith, STSB
- Charles Moulton, PRA Licensing Branch B (APLB)
- Daniel Ju, APLB
- Bryce Lehman, Structural, Civil, Geotech Engineering Branch (ESEB)
- Phyllis Clark, Environmental Review Materials Branch (ELRB)
- Eric Reichelt, Piping and Head Penetrations Branch (NPHP)
- John Tsao, Vessels and Internals Branch (NVIB)
- Matthew Yoder, Corrosion and Steam Generator Branch (NCSG)
- Paul Klein, NCSG

- Benjamin Parks, Nuclear Methods and Fuel Analysis (SFNB)
- Osvaldo Pensado, Southwest Research Institute (SWRI)
- Stuart Stothoff, SWRI

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 October 10, 2022, through February 24, 2023. 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.

Appendix

Initial Audit Items List

Item #	Audit Item
1	<p data-bbox="326 401 1317 459">Files to verify the computer-aided design (CAD) model debris generation and NARWHAL software results. Specifically, the NRC staff requests:</p> <ul style="list-style-type: none"><li data-bbox="334 499 1386 594">(a) Excel files with debris generated and transported, itemized by weld location, break size, and orientation. This will allow examination for testing limits being exceeded.<li data-bbox="334 600 1430 695">(b) Excel files with the list of breaks that result in failure, the failure cause, the break size causing failure. Provide this information for the different pump configurations.<li data-bbox="334 701 1235 730">(c) The list of all weld locations, with coordinates and weld diameters<li data-bbox="334 737 1403 926">(d) Examples of time-varying head loss to compute strainer failure due to physical limits (e.g., flashing, void fraction, structural load), including independent variables (e.g., temperatures, flow rates, debris generated and transported to strainers) to compute the head loss and the physical limits. Provide examples causing physical failure, if they occurred, or just confirm that the only kind of strainer failure computed is exceeding strainer test limits.

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ADAMS Accession No.: ML22264A305

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DRA/APLB/BC	NRR/DSS/STSB/BC
NAME	SWall	SRohrer	JWhitman	VCusumano
DATE	09/21/2022	09/22/2022	09/27/2022	09/28/2022
OFFICE	NRR/DSS/SFNB/BC	NRR/DEX/ESEB/BC(A)	NRR/DNRL/NPHP/BC	NRR/DNRL/NCSSG/BC
NAME	SKrepel	BLEhman	MMitchell	SBloom
DATE	09/27/2022	09/27/2022	09/27/2022	09/30/2022
OFFICE	NRR/DNRL/NVIB/BC	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM	
NAME	ABuford	NSalgado (JWiebe for)	SWall	
DATE	09/30/2022	09/30/2022	09/30/2022	

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