From: Scott Wall
Sent: Tuesday, December 20, 2022 12:10 PM
To: Schultz, Eric
Cc: Phillabaum, Jerry; Mack, Jarrett; Mack, Kenneth
Subject: Final RAI - Point Beach 1 & 2 - License Amendment Request Regarding TSTS-505 (EPID No. L-2022-LLA-0074)

Dear Mr. Schultz,

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 (NextEra, the licensee) submitted a license amendment request (LAR) for Point Beach Nuclear Plant, Units 1 and 2 (Point Beach).

The amendment would revise technical specification (TS) requirements to permit the use of risk-informed completion times (RICTs) for actions to be taken when limiting conditions for operation (LCOs) are not met. The proposed changes are based on Technical Specifications Task Force (TSTF) Traveler TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b," dated July 2, 2018 (ML18183A493). The U.S. Nuclear Regulatory Commission (NRC) issued a final model safety evaluation approving TSTF 505, Revision 2, on November 21, 2018 (ML18269A041).

The NRC staff has reviewed the submittals and determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). On December 20, 2022, the NextEra staff indicated that a response to the RAIs would be provided by January 20, 2023.

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

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Docket Nos. 50-266 and 50-301

Enclosure:
Request for Additional Information

cc: Listserv

RAI (TSTF-505: APLA, APLC, STSB)

REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT

TSTF-505, REVISION 2

NEXTERA ENERGY POINT BEACH, LLC

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-266 and 50-301

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The NRC staff determined that the following information is needed to complete its review.

Probabilistic Risk Assessment Licensing Branch A (APLA) Questions

APLA-RAI-1 (Audit Question 1) – Performance Monitoring

Nuclear Energy Institute (NEI) 06-09, Revision 0, "Risk Informed Technical Specifications Initiative 4b: Risk Managed Technical Specifications (RMTS)" (ML063390639), and the NRC's SE to this guidance (ML071200238), specifies that, in accordance with the fifth key safety principle of Regulatory Guide (RG) 1.174, Revision 3, "An Approach for using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," (ML17317A256), and RG 1.177, Revision 2, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications" (ML20164A034), the impact of the RICT program should be monitored using performance management strategies. Additionally, the final SE for NEI 06-09-A, "Risk Informed Technical Specifications Initiative 4b Risk Managed Technical Specifications (RMTS) Guidelines" (ML12286A322), specifies that the LAR should include a description of the monitoring program. Furthermore, NRC staff position C.3.2, "Scope of the Probabilistic Risk Assessment for Technical Specification Change Evaluations," provided in RG 1.177, Revision 2, for meeting the fifth key safety principle, specifies that performance criteria should be established to assess degradation of operational safety over a period of time. The guidance in NEI 06-09-A considers the use of Nuclear Management and Resources Council (NUMARC) 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" (ML18120A069), as endorsed by RG 1.160, Revision 4, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" (ML18220B281), for the implementation of the Maintenance Rule. NUMARC 93-01, Revision 4F, Section 9.0, dated April 2018, contains guidance for the establishment of performance criteria.

The LAR does not address how the licensee's RMTS process captures performance monitoring for the SSCs within-scope of the RMTS program. Therefore, *-either-*

a. Confirm that the Point Beach Maintenance Rule program incorporates the use of performance criteria to evaluate SSC performance as described in NUMARC 93-01, as endorsed by RG 1.160,

   -or-

b. Describe the approach or method used by Point Beach for SSC performance monitoring, as described in NRC staff position C.3.2 of RG 1.177, Revision 2, for meeting the fifth key safety principle. In the description, include criteria (e.g., qualitative or quantitative), along with the appropriate risk metrics, and explain how the approach and criteria demonstrate the intent to monitor the potential degradation of SSCs in accordance with the NRC final SE for NEI 06-09-A.

APLA-RAI-2 (Audit Question 3) – Impact of Seasonal Variations

The Tier 3 requirement of RG 1.177, Revision 2, stipulates that a licensee should develop a program that ensures that the risk impact of out-of-service equipment is appropriately evaluated prior to performing any maintenance activity. Section 2.3.4 of NEI 06-09-A states, in part, that:

> If the PRA model is constructed using data points or basic events that change as a result of time of year or time of cycle…, then the RICT calculation shall either 1) use the more conservative assumption at all time, or 2) be adjusted appropriately to reflect the current (e.g., seasonal or time of cycle) configuration for the feature as modeled in the PRA.

The LAR does not seem to address whether modeling adjustments are needed to account for seasonal and time of cycle dependencies and what kind of adjustments will be made. Therefore, address the following to clarify the treatment of seasonal and time of cycle variations:

a) Explain how the RICT calculations address changes in PRA data points, basic events, and SSC operability constraints as a result of extreme weather conditions, seasonal variations, other environmental factors, or time of cycle. Also, explain how these adjustments are made in the configuration risk management program (CRMP) model and how this approach is consistent with the guidance in NEI 06-09-A and its associated NRC final SE.

b) Describe the criteria used to determine when PRA adjustments due to extreme weather conditions, seasonal variations, other environmental factors, or time of cycle variations need to be made in the CRMP model and what mechanism initiates these changes.

APLA-RAI-3 (Audit Question 7) – Technical Adequacy of Internal Events and Fire PRA

In Enclosure 2 of the LAR, Section 1, the licensee states, "The PBN [Point Beach] internal events, internal flooding, and fire PRA [probabilistic risk assessment] models described within this LAR are based on those described with NextEra Energy PBN submittals regarding adoption of 10 CFR 50.69, "Risk-informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors" (ML17243A201) with routine maintenance and updates applied."

The NRC staff's SE of the LAR to adopt 10 CFR 50.69 dated November 26, 2018 (ML18289A378), Section 3.5.1, for internal events and fire PRAs, stated that the NRC staff found significant errors and weaknesses in the internal events and fire PRAs, but concluded that this would be resolved prior to implementation of the 10 CFR 50.69 categorization process by the licensee's completion of implementation items ii, iii, iv, v, vi, vii, viii, ix, and x. Therefore, the NRC staff found the quality and level of detail of the internal events and fire PRAs would meet the requirement in 10 CFR 50.69(c)(1)(i) upon completion of these implementation items.

a) Confirm the completion of implementation items ii, iii, iv, v, vi, vii, viii, ix, and x.

b) Justify that the implementation items have an inconsequential impact on the RICT calculations. In the response, address the basis for the assumption.

APLA-RAI-4 (Audit Question 8) – Surrogate for TS 3.3.1 Conditions D, E, K, L, M, N, O, P, Q, and U

In Enclosure 1 of the LAR, Table E1-1, the licensee states that instrumentation associated with TS 3.3.1 functions 2.a, 2.b, 5, 6, 7.a, 7.b, 8, 9.a, 9.b, 10.a, 10.b, 11, 12, 13, 14, 15.a, 15.b, 16, 19, and 21 are not modeled in the PRA. Table E1-1 states for these functions, which are related to TS 3.3.1 conditions D, E, K, L, M, N, O, P, and U, that one of two inoperable reactor trip breakers will be used as a surrogate for these functions and conditions.

Table E1-1 states that instrumentation associated with TS 3.3.1 condition Q, function 18, "Reactor Trip Breakers (RTB)," is not modeled in the PRA. Table E1-1 for this function states "This SSC [structure, system, and component) is used as a surrogate for other TS 3.3.1 RPS [Reactor Protection System] Instrumentation Conditions." However, the LAR did not provide an adequate description for the NRC staff to conclude that the PRA modeling will be sufficient.

a) Provide additional detail on the surrogate(s) used (internal events PRA and fire PRA) for TS 3.3.1 functions 2.a, 2.b, 5, 6, 7.a, 7.b, 8, 9.a, 9.b, 10.a, 10.b, 11, 12, 13, 14, 15.a, 15.b, 16, 18, 19, and 21 associated with conditions D, E, K, L, M, N, O, P, Q, and U.

b) Provide justification that the surrogate(s) adequately captures configuration risk, is conservative and bounding. TS 3.3.1 allows separate condition entry for each function. Include in the discussion configuration risk for one function versus multiple functions.

c) Explain the impact on the RICT calculations for one function inoperable versus multiple functions inoperable.

APLA-RAI-5 (Audit Question 9) – Surrogate for TS 3.3.2.B

In Enclosure 1 of the LAR, Table E1-1, for TS 3.3.2, states for condition B, function 1.a, "The operator actions for failure to manually actuate SI [safety injection] will be used as a surrogate to conservatively bound the risk increase associated with this function as permitted by NEI 06-09." Table E1-1 states for condition B, function 3.a, "The condition of manual SI function inoperable is used as a surrogate for this condition since an SI signal generates a CI [containment isolation] signal." In addition, Table E1-1 states for these functions, that the PRA success criteria is not modeled.

a) Provide additional detail on the surrogate(s) used (internal events PRA, and fire PRA) for TS 3.3.2 condition B, functions 1.a and 3.a.

b) Provide justification that the surrogate(s) adequately captures configuration risk, is conservative and bounding (internal events PRA, and fire PRA). TS 3.3.2 allows separate condition entry for each function. Include in the discussion configuration risk for one function versus multiple functions.

c) Explain the impact on the RICT calculations.

APLA-RAI-6 (Audit Question 10) – Surrogate for TS 3.3.2 Conditions C and D

In Enclosure 1 of the LAR, Table E1-1, for TS 3.3.2, states for condition C, function 1.b, "The failure of the automatic SI signals will be used as a surrogate to conservatively bound the risk increase associated with this function as permitted by NEI 06-09." Table E1-1 states for TS 3.3.2, condition C, function 3.b, "The condition of automatic SI function inoperable is used as a surrogate for this condition since an SI signal generates a CI signal." Table E1-1 states for TS 3.3.2, condition D, functions 1.c, 1.d, and 1.e, "The condition of automatic SI function inoperable is used as a surrogate for this condition since it is the same function (SI initiation)." In addition, Table E1-1 states for these functions, that the PRA success criteria is not modeled for these functions.

a) Provide additional details on the surrogate(s) used (internal events PRA, and fire PRA) for TS 3.3.2 conditions C and D, functions 1.b, 3.b, 1.c, 1.d, and 1.e.

b) Provide justification that the surrogate(s) adequately captures configuration risk, is conservative and bounding (internal events PRA, and fire PRA). TS 3.3.2 allows separate condition entry for each function. Include in the discussion configuration risk for one function versus multiple functions.

c) Explain the impact on the RICT calculations for one function inoperable versus multiple functions inoperable.

APLA-RAI-7 (Audit Question 11) – Surrogate for TS 3.3.2 Conditions D, F, and G

In Enclosure 1 of the LAR, Table E1-1, for TS 3.3.2, states for condition D, function 4.c, "The failure of the model logic for steam generator isolation will be used as a surrogate to conservatively bound the risk increase associated with this function as permitted by NEI 06-09." Table E1-1 states for TS 3.3.2, condition D, functions 4.d, 4.e, 5.b, condition F, function 4.a, and condition G, function 4.b, "The condition of steam generator isolation function inoperable is used

as a surrogate for this condition." In addition, table E1-1 states for these functions, that the PRA success criteria is not modeled.

a) Provide additional details on the surrogate(s) used (internal events PRA, and fire PRA) for TS 3.3.2 conditions D, F, and G, functions 4.a, 4.b, 4.c, 4.d, 4.e, and 5.b.

b) Provide justification that the surrogate(s) adequately captures configuration risk, is conservative and bounding (internal events PRA, and fire PRA). TS 3.3.2 allows separate condition entry for each function. Include in the discussion configuration risk for one function versus multiple functions.

c) Explain the impact on the RICT calculations for one function inoperable versus multiple functions inoperable.

APLA-RAI-8 (Audit Question 12) – Surrogate for TS 3.3.2 Conditions D, G, and H

In Enclosure 1 of the LAR, Table E1-1, for TS 3.3.2, states for condition D, function 6.b, and condition G, function 6.a, "The failure of the model logic for these relays will be used as a surrogate to conservatively bound the risk increase associated with this function as permitted by NEI 06-09." Table E1-1 states for TS 3.3.2, condition H, function 6.d, "The failure of the model logic for starting all four AFW pumps will be used as a surrogate to conservatively bound the risk increase associated with this function as permitted by NEI 06-09." Table E1-1 states for TS 3.3.2, condition G, function 5.a, "The condition of AFW initiation is used as a surrogate for this condition." In addition, table E1-1 for these functions, states that the PRA success criteria is not modeled.

a) Provide additional details on the surrogate(s) used (internal events PRA, and fire PRA) for TS 3.3.2 conditions D, G, and H, functions 5.a, 6.a, 6.b, and 6.d.

b) Provide justification that the surrogate(s) adequately captures configuration risk, is conservative and bounding (internal events PRA, and fire PRA). TS 3.3.2 allows separate condition entry for each function. Include in the discussion configuration risk for one function versus multiple functions.

c) Explain the impact on the RICT calculations for one function inoperable versus multiple functions inoperable.

APLA-RAI-9 (Audit Question 13) – Surrogate for TS 3.6.2 Condition C
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n Enclosure 1 of the LAR, Table E1-1, for TS 3.6.2, Condition C, "One or more containment air locks inoperable for reasons other than Conditions A or B," states that the PRA success criteria is not modeled for the containment airlock and that, "The failure of the model logic for containment penetrations will be used as a surrogate to conservatively bound the risk increase associated with this function as permitted by NEI 06-09."

a) Provide additional details on the surrogate(s) used (internal events PRA, and fire PRA) for TS 3.6.2 condition C.

    i. Include in the discussion the impact of this surrogate on large early release calculations compared to the airlock.

ii. Briefly describe the effect of the failure of early containment isolation (i.e., plant response to the failure of the modeled pathway).

b) Provide justification that the surrogate(s) adequately captures configuration risk, is conservative and bounds the effect of an inoperable containment airlock door (internal events PRA, and fire PRA).

APLA-RAI-10 (Audit Question 14) – Surrogate for TS 3.6.3 Conditions A and C

In Enclosure 1 of the LAR, Table E1-1, for TS 3.6.3, Conditions A and C for one or more penetration flow paths with one containment isolation valve inoperable, states that the PRA success criteria is not modeled for these containment penetrations and that, "The failure of the model logic for containment penetrations will be used as a surrogate to conservatively bound the risk increase associated with this function as permitted by NEI 06-09."

a) Provide additional details on the surrogate(s) used (internal events PRA, and fire PRA) for TS 3.6.3 conditions A and C. Clarify which modeled pathways will be used as a surrogate for each of the system isolation functions affected.

b) Provide justification that the surrogate(s) adequately captures configuration risk, is conservative and bounds each of the isolation functions (internal events PRA, and fire PRA).

Probabilistic Risk Assessment Licensing Branch C (APLC) Questions

APLC-RAI-1 (Audit Question 18) – Calculation of Seismic CDF

Section 2.3.1, Item 7, of NEI 06-09-A, states that the "impact of other external events risk shall be addressed in the RMTS program," and explains that one method to do this is by "performing a reasonable bounding analysis and applying it along with the internal events risk contribution in calculating the configuration risk and the associated RICT." The NRC staff's safety evaluation for NEI 06-09 (Reference 5) states that "[w]here PRA models are not available, conservative or bounding analyses may be performed to quantify the risk impact and support the calculation of the RICT."

In Enclosure 4 of the LAR, Section 2.2, the licensee provides its seismic core damage frequency (SCDF) penalty value of 6.24E-6/year for use in this application based on the plant-specific seismic hazard curves submitted by the licensee in response to the NRC's post-Fukushima actions. However, the licensee did not provide information on the plant-level high confidence of low probability of failure (HCLPF) and the composite variability in the plant-level acceleration capacity (β_c) values used for SCDF estimate in the LAR. The NRC staff noted that the licensee's calculation PBN-BFJR-14-013, "Point Beach Seismic CDF Estimate," in the audit portal provides information on the HCLPF and β_c values and how they are determined and used in estimating the SCDF.

Provide on the docket a summary of the HCLPF and β_c values used for SCDF penalty estimate for this application with justification that these values are the best-available representation of the plant's seismic capacity.

APLC-RAI-2 (Audit Question 19) – Calculation of Seismic LERF

As indicated in the NRC staff's SE for NEI 06-09-A, other sources of risk (i.e., seismic and other external events) must be quantitatively assessed if they contribute significantly to configuration-specific risk. The SE for NEI 06-09, also states that bounding analyses or other conservative quantitative evaluations are permitted where realistic PRA models are unavailable.

In Enclosure 4 of the LAR, Section 2.2, the licensee used a ratio of 0.042 based on the LERF to CDF from the internal events PRA model to estimate seismic LERF (SLERF). However, the licensee did not provide justification for why the ratio of LERF to core damage frequency (CDF) for seismic events should be the same as that from internal events. Based on its review of not only seismic PRAs but also seismic LERF penalties for RICT applications, the NRC staff has noted that the LERF-to-CDF ratio for seismic events can be significantly higher than the ratio for internal events and is typically much higher than 4.2% due to the unique nature of seismically induced failures. It is unclear that the estimated SLERF based on this ratio can be considered a conservative or bounding value. Therefore, the licensee is requested to address the following:

a. Justify that the SLERF provided in the LAR to support RICT calculations for Point Beach is conservative or bounding. Include the rationale that the use of a ratio derived from the internal events is conservative or bounding for seismically induced events, given that random events in internal events PRA do not necessarily capture seismically induced failures that uniquely contribute to SLERF.

b. If the approach to estimating SLERF cannot be justified as bounding for this application in response to part (a) above, then provide, with justification, the conservative or bounding SLERF penalty for use in RICT calculations.

APLC-RAI-3 (Audit Question 20) – Evaluation of Seismic Induced Loss of Offsite Power

Section 2.3.1, Item 7, of NEI 06-09-A, states that the "impact of other external events risk shall be addressed in the RMTS program," and explains that one method to do this is by "performing a reasonable bounding analysis and applying it along with the internal events risk contribution in calculating the configuration risk and the associated RICT." The NRC staff's SE for NEI 06-09 states that "[w]here [probabilistic risk assessment] PRA models are not available, conservative or bounding analyses may be performed to quantify the risk impact and support the calculation of the RICT."

In Enclosure 4 of the LAR, Section 2.2, the licensee did not address the incremental risk associated with seismic-induced loss of offsite power (LOOP) that may occur following the design basis seismic event. The accident scenarios associated with seismically induced (and therefore unrecoverable) LOOP frequency could already be addressed to some extent in the internal events PRA for unrecovered LOOP events, but this is not explained either.

Demonstrate that seismically induced LOOP will have an inconsequential impact on the RICT calculations.

APLC-RAI-4 (Audit Question 21) – Plant Configuration-Specific Considerations for External Events

Section 2.3.1, Item 7, of NEI 06-09-A, states that the "impact of other external events risk shall be addressed in the RMTS program," and explains that one method to do this is by documenting prior to the RMTS program that external events that are not modeled in the PRA are not significant contributors to configuration risk. The NRC staff's SE for NEI 06-09 states

that “[o]ther external events are also treated quantitatively, unless it is demonstrated that these risk sources are insignificant contributors to configuration-specific risk.”

In Enclosure 4 of the LAR, Sections 2.1 and 2.3, the licensee concluded that all external hazards except seismic are screened from the RICT program. However, the licensee did not include a discussion if these hazards can be screened from plant’s configuration-specific risk considered in the LAR.

Confirm that all external hazards are insignificant contributors to the configuration-specific risk considered in the application. If not, consider a conservative or bounding analysis to quantify the risk from these external hazards for specific configurations in the proposed RICTs and support the calculation of the RICTs.

Technical Specifications Branch (STSB) Questions

STSB-RAI-1 (Audit Question 22)

The NRC staff noted the following editorial issues in Attachment 3 of the LAR (bases mark-up):

- For TS 3.3.1, Actions Q.1 and Q.2, the licensee inserted the phrase “allowed by Condition Y” in between “6” and “hours”. Staff believes “allowed by Condition Y” should be inserted after “6 hours”. Confirm and correct.
- For TS 3.3.2, Actions C1, C.2.1, and C.2.2, there appears to be a typo where “Seabrook” is referenced instead of “Point Beach”. Confirm and correct.
- For TS 3.3.2.D.1, D.2.1, and D.2.2, there appears to be a typo where “Seabrook” is referenced instead of “Point Beach”. Confirm and correct.
- For TS 3.5.2.A.1, the term “front stop” was added. Provide justification for adding this language.
- For SR 3.5.2.1, there appears to be blue font in the text. Provide justification and correct.
- For TS 3.6.3.C.1 and C.2, there appears to be blue font in the text. Provide justification and correct.
- For TS 3.7.2, the licensee removed the word “check” from LCO description. Provide justification and correct.
- For TS 3.7.5.B.1, the licensee removed secondary completion time, but there appears to remain a paragraph regarding the 10-day secondary completion time that needs removed. Confirm and correct.
- For TS 3.7.7 applicability, there appears to be blue font in the text. Provide justification and correct.

STSB-RAI-2 (Audit Question 23)

In Enclosure 1 of the LAR, Table E1-1 for TS LCO 3.3.1.O, for FU15b “Two Turbine trip – Stop Valve Closure channels”, the design success criteria list 2 of 3. Staff notes that Table 3.3.1-1 of TS states that there are 2 required channels, so it appears that the design success criteria should be 1 of 2. Confirm and correct.

STSB-RAI-3 (Audit Question 24)

NRC staff suggestion for licensee consideration: The proposed administrative controls for the RICT Program in TS 5.5.7 paragraph “e” of Attachment 2 to the LAR was based on the TS

markups of TSTF-505, Revision 2, for Point Beach. The NRC staff recognizes that the model SE for TSTF-505, Revision 2, contains improved phrasing for the administrative controls for the RICT Program in TS 5.5.7 paragraph “e”; namely the phrasing “approved for use with this program” instead of “used to support this license amendment.” In lieu of the original phrasing in TS 5.5.7 paragraph “e”, discuss whether the phrases “used to support Amendment # xxx” or, as discussed in the TSTF-505 model SE, “approved for use with this program” would provide more clarity for this paragraph.

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