



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

APRIL 22, 2024

**POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 – AUTHORIZATION AND SAFETY
EVALUATION FOR ALTERNATIVE REQUEST NO. I6-RR-01 (EPID L-2023-LLR-0030)**

LICENSEE INFORMATION

Recipient's Name and Address: 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

Licensee: NextEra Energy Point Beach, LLC.

Plant Name(s) and Unit(s): Point Beach Nuclear Plant, Units 1 and 2 (Point Beach)

Docket No(s).: 50-266
50-301

APPLICATION INFORMATION

Submittal Date: June 27, 2023

Submittal Agencywide Documents Access and Management System (ADAMS) Accession No.: ML23178A142

Applicable Inservice Inspection (ISI) Interval and Interval Start/End Dates: The sixth 10-year ISI interval started on August 1, 2022, and is scheduled to end on July 31, 2032.

Alternative Provision: The applicant requested an alternative under Title 10 of the *Code of Federal Regulations* (10 CFR), paragraph 50.55a(z)(1).

ISI Requirement: The licensee conducts inspections of buried components for the emergency diesel generator (EDG) Class 3 (G-03 and G-04 only) and fuel oil subsystems in accordance with the 2017 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Division 1, "Rules for Inservice Inspection of Nuclear Power Plant Components."

Applicable Code Edition and Addenda: The code of record for the inservice inspection (ISI) and repair/replacement program is the 2017 Edition of ASME Code, Section XI.

Brief Description of the Proposed Alternative: Pursuant to 10 CFR 50.55a(z)(1), the licensee submitted a relief request from the requirements of ASME Code, Section XI, IWD-5210, IWD-5220, and IWA-5244 for the EDG Class 3 glycol cooling (G-03 and G-04 only) and fuel oil subsystems which are ASME Code Examination Category D-B, Item No. D2.10 components.

These subsystems are routinely inspected and tested by existing technical specification (TS) tests for operability of EDGs. In lieu of performing the system pressure test on the EDG sub-system each period, in accordance with IWD-5220 and Examination Category D-B, Item No. D2.10, the licensee proposed to use existing technical specification testing of these subsystems. The licensee performs surveillance testing monthly in accordance with site technical specification test procedures TS-81, 82, 83, and 84 to demonstrate EDG operability. The licensee indicated that there are no additional examinations imposed on the EDG subsystems because of pressure/temperature or size exemptions included in paragraph IWD-1220 of section XI and, therefore, verification of pressure boundary structural integrity on EDG subsystems is not included in the Point Beach ISI program. The licensee also stated that operations personnel are specifically trained for the testing of the standby EDGs and that surveillance testing records pressure, level, and temperature which provides the supporting data for the verification of component integrity. Further, essentially the same relief was authorized by the NRC for use at Point Beach during the third, fourth and fifth 10-year inspection intervals. Detailed information concerning specific tests performed on the fuel oil transfer subsystem and glycol cooling subsystem was provided by the licensee in its basis for requesting relief.

For additional details on the licensee's request, refer to the documents located at the ADAMS Accession No(s). identified above.

STAFF EVALUATION

The licensee has a history in using the Point Beach corrective action program to successfully identify instances of leakage associated with the EDGs. The EDGs are tested every month by operations personnel. The EDGs are run to test their ability to start when required and to look for any problems that may have occurred while standing idle. During the testing, the EDG systems are examined for leakage. The licensee monitors the diesels three times each day by walk-downs. During the walkdown, operations personnel look at the appropriate water level, sump tank fuel level, starting air bank pressure, fuel oil day tank level, service water pressure, glycol expansion tank levels, and storage tanks. If the readings are not within specifications, the Shift Manager is informed, and appropriate action is initiated. The operations personnel also take a general look at the diesels. Also, the diesels are thoroughly examined as part of routine maintenance procedures. Any significant discrepancies require the initiation of an Action Request and, if appropriate, a Work Order to correct the identified discrepancies.

The licensee's existing surveillance tests are required by the current plant TSs every 30 days which is a much more frequent testing schedule than the 40-month system pressure testing frequency required by the ASME Code. The required surveillance testing is routinely performed on various portions of the subject system and is intended to demonstrate component operability. As such, the tests provide an indirect verification of the leakage integrity of the pressure boundary, in lieu of a direct visual examination performed under normal operating pressure.

The NRC staff finds that the proposed surveillance testing, although not a direct examination and less sensitive to small leakage than the ASME Code-required pressure testing, is performed at more frequent intervals and the parameters monitored should ensure that the leakage integrity of the pressure boundary will be maintained. Therefore, the NRC staff concludes that the proposed alternative provides for an acceptable level of quality and safety for EDG subsystems.

The NRC staff finds that the alternative testing requirements described above are acceptable because the surveillance testing would detect any leakage in the system, which is the main objective of the ASME Code-required VT-2 examinations. The NRC staff also finds that the

surveillance testing performed in accordance with the requirements of the plant technical specifications provides for an acceptable level of quality and safety.

CONCLUSION

As set forth above, the NRC staff determines that the licensee's proposed alternative provides for an acceptable level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(z)(1). Therefore, the NRC staff authorizes the use of the alternative request, I6-RR-01, at Point Beach, Units 1 and 2, for the remainder of the sixth 10-year ISI interval which is scheduled to end on July 31, 2032.

All other ASME Code, Section XI, requirements for which an alternative was not specifically requested and authorized remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: O. Khan, NRR

Date: April 22, 2024

Jeffrey A. Whited, Chief
Plant Licensing Branch III
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Office of Nuclear Reactor Regulation

cc: Listserv

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DATED APRIL 22, 2024**

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NRR-028

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