UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

April 11, 2024

Michael Durbin
Site Vice President
NextEra Energy Point Beach, LLC
6610 Nuclear Road
Two Rivers, WI 54241-9516

SUBJECT: POINT BEACH NUCLEAR PLANT – INTEGRATED INSPECTION REPORT 05000266/2024001 AND 05000301/2024001

Dear Michael Durbin:

On March 31, 2024, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Point Beach Nuclear Plant. On April 4, 2024, the NRC inspectors discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

One finding of very low safety significance (Green) is documented in this report. This finding involved a violation of NRC requirements. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violation or the significance or severity of the violation documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region III; the Director, Office of Enforcement; and the NRC Resident Inspector at Point Beach Nuclear Plant.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region III; and the NRC Resident Inspector at Point Beach Nuclear Plant.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Signed by Dickson, Billy
on 04/11/24

Billy C. Dickson, Jr., Chief
Reactor Projects Branch 2
Division of Operating Reactor Safety

Docket Nos. 05000266 and 05000301
License Nos. DPR-24 and DPR-27

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

Letter to Michael Durbin from Billy C. Dickson, Jr., dated April 11, 2024.

SUBJECT: POINT BEACH NUCLEAR PLANT – INTEGRATED INSPECTION REPORT 05000266/2024001 AND 05000301/2024001

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers:	05000266 and 05000301
License Numbers:	DPR-24 and DPR-27
Report Numbers:	05000266/2024001 and 05000301/2024001
Enterprise Identifier:	I-2024-001-0077
Licensee:	NextEra Energy Point Beach, LLC
Facility:	Point Beach Nuclear Plant
Location:	Two Rivers, WI
Inspection Dates:	January 01, 2024 to March 31, 2024
Inspectors:	J. Masse, Resident Inspector V. Petrella, Resident Inspector M. Stafford, Senior Resident Inspector
Approved By:	Billy C. Dickson, Jr., Chief Reactor Projects Branch 2 Division of Operating Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Point Beach Nuclear Plant, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to https://www.nrc.gov/reactors/operating/oversight.html for more information.

List of Findings and Violations

Failure to Account for Instrument Uncertainty			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Barrier Integrity	Green NCV 05000266,05000301/2024001-01 Open/Closed	[P.3] - Resolution	71111.24
The inspectors identified a Green finding and an associated non-cited violation (NCV) of Title 10 CFR, Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," when the licensee failed to prescribe an instruction or procedure with the appropriate qualitative or quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Specifically, the licensee failed to account for instrument uncertainty when calculating the technical specification value of sodium hydroxide in the spray additive tank.			

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
URI	05000266,05000301/2023004-03	Potential Failure to Correct an NRC Identified Violation	71152A	Closed

PLANT STATUS

Unit 1 began the inspection period at rated thermal power and remained at or near full power throughout the remainder of the inspection period.

Unit 2 began the inspection period at rated thermal power and remained at or near full power throughout the remainder of the inspection period.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors performed activities described in IMC 2515, Appendix D, "Plant Status," observed risk-significant activities, and completed on-site portions of IPs. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Impending Severe Weather Sample (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated the adequacy of the overall preparations to protect risk-significant systems from impending severe weather with a blizzard moving through the area on January 12, 2024.

71111.04 - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

(1) Unit 2 motor driven auxiliary feedwater pump on January 23, 2024
(2) 125 volt direct current station batteries and switchgear on February 2, 2024
(3) G-01 emergency diesel generator starting air system and fuel oil system on February 12, 2024
(4) G-04 emergency diesel generator starting air system, fuel oil system, and the glycol cooling system on February 13, 2024
(5) Unit 1 train A and B component cooling water loops on March 8, 2024

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (2 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

(1) Fire zones 552 and 553 on January 19, 2024
(2) Fire zones 225, 226, 227, and 228 on January 24, 2024

Fire Brigade Drill Performance Sample (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated the onsite fire brigade training and performance during an announced fire drill on February 22, 2024.

71111.06 - Flood Protection Measures

Flooding Sample (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated internal flooding mitigation protections in the: Unit 1 and Unit 2 residual heat removal pump cubicles

71111.07A - Heat Exchanger/Sink Performance

Annual Review (IP Section 03.01) (1 Sample)

The inspectors evaluated readiness and performance of:

(1) HX-13B spent fuel pool heat exchanger on March 28, 2024

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

(1) The inspectors observed and evaluated licensed operator performance in the control room during the response to a plant process computer system indication failure on January 29, 2024, and during minor power changes to support turbine-driven auxiliary feedwater pump testing on February 8, 2024.

Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)

(1) The inspectors observed and evaluated an operator simulator evaluation on January 22, 2024.

71111.12 - Maintenance Effectiveness

Quality Control (IP Section 03.02) (1 Sample)

The inspectors evaluated the effectiveness of maintenance and quality control activities to ensure the following SSC remains capable of performing its intended function:

(1) Fire protection foam used in barrier penetrations between fire areas

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (2 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

(1) Unit 1 elevated risk due to the TS 3A, Turbine Trip Test Unit 1, on January 24, 2024
(2) Unit 1 elevated risk due to 1ICP 02.013, 4.16 KV Undervoltage Matrix Relays Surveillance Test, on January 2, 2024

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (4 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

(1) Operability determination for boric acid found inside 2W-1B1 fan cubicle, Containment Accident Recirculation Fan, on January 22, 2024
(2) Operability determination for the seal leakage on 1P-11B, Component Cooling Water Pump, on January 24, 2024
(3) Operability determination for voids found in piping for the 1P-10A and 1P-10B residual heat removal pumps on February 1, 2024
(4) Operability determination for elevated temperatures on 1P-11A, component cooling water pump, on March 8, 2024

71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (1 Sample)

The inspectors evaluated the following temporary or permanent modifications:

(1) Battery and inverter room cooler modifications

71111.24 - Testing and Maintenance of Equipment Important to Risk

The inspectors evaluated the following testing and maintenance activities to verify system operability and/or functionality:

Post-Maintenance Testing (PMT) (IP Section 03.01) (2 Samples)

(1) OI 70, Service Water System Operation after a strainer backwash arm replacement on February 29, 2024
(2) Post-maintenance testing after various preventative maintenance activities on the G-02 emergency diesel generator on March 5, 2024

Surveillance Testing (IP Section 03.01) (5 Samples)

(1) Unit 1 train B engineered safety features logic testing, on January 18, 2024
(2) Unit 1 train B reactor protection system logic testing on January 18, 2024
(3) IT 05B, Containment Spray Pumps and Valves (Cold Shutdown) Unit 1, on January 22, 2024
(4) 1ICP 02.032, 1P-29 Auxiliary Feedwater Suction Header Pressure Trip Channel Operability Test, on January 25, 2024
(5) Calculation of sodium hydroxide in the spray additive tank on February 1, 2024

Inservice Testing (IST) (IP Section 03.01) (1 Sample)

(1) Cold start of turbine-driven auxiliary feed pump, on February 8, 2024

71114.06 - Drill Evaluation

Required Emergency Preparedness Drill (1 Sample)

(1) Point Beach first quarter emergency preparedness and information technology cyber drill on January 16, 2024.

Additional Drill and/or Training Evolution (1 Sample)

The inspectors evaluated:

(1) Drill and exercise performance (DEP) opportunity during licensed operator requalification training on January 22, 2024.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

IE01: Unplanned Scrams per 7000 Critical Hours Sample (IP Section 02.01) (2 Samples)

(1) Unit 1 (January 1, 2023 through December 31, 2023)
(2) Unit 2 (January 1, 2023 through December 31, 2023)

IE03: Unplanned Power Changes per 7000 Critical Hours Sample (IP Section 02.02) (2 Samples)

(1) Unit 1 (January 1, 2023 through December 31, 2023)
(2) Unit 2 (January 1, 2023 through December 31, 2023)

IE04: Unplanned Scrams with Complications (USwC) Sample (IP Section 02.03) (2 Samples)

(1) Unit 1 (January 1, 2023 through December 31, 2023)
(2) Unit 2 (January 1, 2023 through December 31, 2023)

71152S - Semiannual Trend Problem Identification and Resolution

Semiannual Trend Review (Section 03.02) (1 Sample)

(1) The inspectors reviewed the licensee's corrective action program for potential adverse trends in pre-fire plan accuracy that might be indicative of a more significant safety issue. A minor violation identified as a part of this review is documented in the Results Section of this report.

INSPECTION RESULTS

Failure to Account for Instrument Uncertainty			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Barrier Integrity	Green NCV 05000266,05000301/2024001-01 Open/Closed	[P.3] - Resolution	71111.24

The inspectors identified a Green finding and an associated non-cited violation (NCV) of Title 10 CFR, Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," when the licensee failed to prescribe an instruction or procedure with the appropriate qualitative or quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Specifically, the licensee failed to account for instrument uncertainty when calculating the technical specification value of sodium hydroxide in the spray additive tank.

Description:

In the Point Beach 4th Quarter Integrated Inspection Report, 2023004 (ML24032A056), the NRC documented Unresolved Item 2023004-03 concerning a potential failure to correct a NRC identified violation. Specifically, the inspectors reviewed the corrective actions for NCV 2022002-01, issued in July 2022 (ML22208A123). The inspectors found that the licensee had failed to implement corrective actions to address this violation. Working with regional staff, the inspectors have determined that this represents a repeat violation of 10 CFR, Part 50, Appendix B, Criterion V. The following is a synopsis of this violation.

The spray additive system, supported by the containment spray system, assists in reducing the iodine fission product inventory in the containment atmosphere resulting from a design basis accident (DBA).

Radioiodine in its various forms is the fission product of primary concern in the evaluation of a DBA. It is absorbed by the spray from the containment atmosphere. To enhance the iodine absorption capacity of the spray, the spray solution is adjusted to an alkaline pH that promotes iodine hydrolysis. This process converts iodine to a nonvolatile form. Because of its stability when exposed to radiation and elevated temperatures, sodium hydroxide (NaOH) is the preferred spray additive. The NaOH added to the spray also ensures a pH value in the acceptable range of 7.0 to 10.5. The minimum pH in the containment sump needed to keep

iodine in the iodate form is 7.0. A pH greater than 7 assures the continued iodine removal effectiveness. The maximum pH is based on equipment qualification considerations to minimize the occurrence of chloride and caustic stress corrosion on mechanical systems and components and is set to 10.5.

Technical Specification Surveillance Requirement (SR) 3.6.7.3 requires the licensee to determine the concentration of NaOH in the spray additive tank and perform this surveillance test every six (6) months. The requirement is to verify that the spray additive tank NaOH solution concentration is greater than or equal to 30 percent and less than or equal to 33 percent by weight.

The licensee uses procedure CAMP 226, “Sodium Hydroxide: H2SO4 Titration Method,” to determine the concentration of sodium hydroxide in the sample. In the procedure, the licensee titrates the sample from the sodium hydroxide tank using sulfuric acid. After the titration, the licensee then calculates the percentage of NaOH. The procedure states, in part, that “the 2-sigma precision and single measurement accuracy is approximately +/- 0.3 [percent] NaOH.” This means that the instrument uncertainty of the titration is +/- 0.3 percent NaOH.

The work orders that direct the licensee to perform CAMP 226 contain the acceptance criteria from the technical specification surveillance requirement SR 3.6.7.3 of greater than or equal to 30 percent and less than or equal to 33 percent by weight. This acceptance criteria does not consider the instrument uncertainty discussed in CAMP 226.

The NRC inspectors and licensee did not find any evidence that the calculation 2000-0036, pH of Post LOCA Sump and Containment Spray, took instrument uncertainty into account.

Corrective Actions: Once the licensee became aware of the problem, they updated the asset change table and made assignments to progress the change through their system. The PM model work order has been updated and the procedure has been performed correctly for each unit.

Corrective Action References: Action Request (AR) 02430785 – SAT Analysis Work Order Documentation (NRC Identified), AR 02472083 – PMC in Screening for Extended Amount of Time and AR 02473217 – CA Untimely due to Inappropriate Closure to PMCR

Performance Assessment:

Performance Deficiency: The inspectors determined that the failure to prescribe an instruction or procedure with the appropriate qualitative or quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished was a violation of 10 CFR Part 50, Appendix B, Criterion V, and was a performance deficiency. Specifically, the licensee did not consider the instrument uncertainty when determining the concentration of sodium hydroxide.

Screening: The inspectors determined the performance deficiency was more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, the failure to not take into account the instrument uncertainty on the spray additive tank solution could result in the NaOH concentration being outside of the allowed band and therefore the system would not meet its design basis.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, “The Significance Determination Process (SDP) for Findings At-Power.” Specifically, the inspectors determined the finding was of very low safety significance (Green) because the inspectors answered “no” to all the questions in Exhibit 3.C.

Cross-Cutting Aspect: P.3 - Resolution: The organization takes effective corrective actions to address issues in a timely manner commensurate with their safety significance. Specifically, the licensee closed their corrective action document to a work order change but failed to update the work order. The failure went unnoticed until the NRC questioned the status of the work order change.

Enforcement:

Violation: Title 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” requires in part, that instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, prior to October 25, 2023, the licensee failed to prescribe an appropriate instruction or procedure with the appropriate qualitative or quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Specifically, in the work orders calculating sodium hydroxide concentration in the spray additive tank, the licensee did not consider the instrument uncertainty for determining this concentration, as specified in CAMP 226, “Sodium Hydroxide: H2SO4 Titration Method.”

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

The disposition of this finding and associated violation closes URI: 05000266,05000301/2023004-03.

Unresolved Item (Closed)	Potential Failure to Correct an NRC Identified Violation URI 05000266,05000301/2023004-03	71152A

Description: A finding/violation was identified as described above.

Corrective Action Reference(s): AR 02472083 – PMC in Screening for Extended Amount of Time and AR 02473217 – CA Untimely due to Inappropriate Closure to PMCR

Minor Violation	71152S

Failure to Perform Independent Assessment in Accordance with Written Checklist

Minor Violation: The licensee's independent assessment, "PBN 21-006, Fire Protection," reviewed the Point Beach Fire Protection Program and its compliance with 10 CFR 50.48, "Fire protection." The assessment contained checklist items that direct the auditor to review elements that are related to the requirements of the fire protection program. Checklist item 6 contained an element that directed the auditor to perform the following:

> Verify current and detailed pre-fire plans are available to the industrial fire brigade for all areas in which a fire could jeopardize the ability to meet NFPA 805, Section 1.5, performance criteria, including the following:

- The plans detail the fire area configuration and fire hazards to be encountered in the fire area, along with any nuclear safety components and fire protection systems and features that are present.
- The plans are available in the control room and made available to the plant industrial fire brigade.

The plans address coordination with other plant groups during fire emergencies. Ref. NFPA 805, 3.4.2

The completed assessment results state:

> Fire Plans are in the Control Room and the Fire Brigade Ready Area in a hard copy format. A physical walkdown by the auditor found both binders contained current revisions as required. Auditor validated no outstanding revisions to these pre-fire plans existed. The review and validation did not identify any gaps and is considered satisfactory.

The inspector noted that the assessment results do not specifically state how the auditor verified the plans detail the fire area configuration and fire hazards to be encountered in the fire area, along with any nuclear safety components and fire protection systems and features that are present.

The NRC inspectors have identified several cases where pre-fire plans (PFPs) contained discrepancies in their respective fire area configurations. Upon discovery of these discrepancies, the inspectors notified the licensee, and the licensee revised the PFPs accordingly. Below is a summary of some condition reports initiated due to the inspectors' questions:

- AR 2410039, *(P) PFP-2-CONT-FAC - PRE-FIRE PLAN UNIT 2 (DOCDIST)*
  - 11/2/2021 – The Unit 2 containment PFP was updated because two oil collection tanks and two hose reels were in the wrong location, a ventilation duct was drawn as a walking path, and there was no opening drawn on 66' containment elevation that leads to the reactor head laydown area.
- AR 2422170, *PFP-0-PAB 8 UPDATES NEEDED, NRC QUESTION*
  - 3/21/2022 – The auxiliary building PFP was updated to show the correct orientation of sprinklers and to add a flammable liquid cabinet.
- AR 2422453, *(S) PFP-0-PAB 8 PRE-FIRE PLAN PRIMARY AUXILIARY BUILDING*
  - 3/23/2022 – The auxiliary building PFP was updated to add pump oil to the Fire category and note that transient combustibles may be present for maintenance.
- AR 2424251, *(S) PFP-1-CONT-FAC - PRE-FIRE PLAN UNIT 1*
  - 4/8/2022 – The Unit 1 containment PFP was updated to add the reactor coolant pump oil collection tank on the 10' platform, and draw obstacles that personnel must walk around.
- AR 2433350, *(P) PFP-0-CB - PRE-FIRE PLAN CONTROL BLDG (DOCDIST) - REV 6*
  - 8/2/2022 – The control building PFP was updated to draw a missing fire door on the map, and revise coloring to represent high risk fire areas.
- AR 2447769, *PFP-0-PAB 8 - PRE-FIRE PLAN PRIMARY AUXILIARY (DOCDIST) - R6*

    - 2/7/2023 – The auxiliary building PFP was updated to add room names, add a subsoil drain, and make fire zone labels more clearly identify their respective zones.
- AR 2463684, *(S) PFP-1-TB-26 - PRE-FIRE PLAN UNIT 1 TURBINE*
    - 8/2/2023 – The turbine building PFP was updated to include a missing dry chemical fire extinguisher, halon storage tanks, a flammable locker, and a flammable cabinet.

These condition reports and the lack of specific documentation in the independent assessment checklist element referenced led the inspectors to conclude that the auditor did not perform the assessment according to the written checklist.

The inspectors determined that failure to perform the independent assessment in accordance with the written checklist was a performance deficiency. Specifically, the auditor did not verify that the plans detail the fire area configuration and fire hazards to be encountered in the fire area, along with any nuclear safety components and fire protection systems and features that are present.

Point Beach Renewed Facility Operating License condition 4.F requires, in part, NextEra Energy Point Beach Units 1 and 2 shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c).

Point Beach's Fire Protection Plan: NP 1.9.14, Section 1.1 states, in part, that the Fire Protection Plan has been established to describe the overall Fire Protection Program (FPP) for the Point Beach Nuclear Plant (PBNP). NP 1.9.14, Section 4.12 states, in part, that the NextEra Quality Assurance Topical Report (QATR) (FPL-1) provides the quality assurance requirements for the PBNP. The following elements of the QATR apply to those items within the scope of the Fire Protection Program: Audits.

The NextEra QATR, Section C.3, Independent Assessment, states, in part, planning for independent assessments identifies the characteristics and activities to be assessed and the relevant performance and/or acceptance criteria. Independent assessments are then conducted using these predetermined criteria.

Contrary to the above, on August 27, 2021, the licensee did not conduct an independent assessment using the predetermined criteria. Specifically, independent assessment PBN 21-006, Fire Protection, checklist item #6 contained a predetermined criterion for the auditor to verify detailed pre-fire plans detail the fire area configuration and fire hazards to be encountered in the fire area, along with any nuclear safety components and fire protection systems and features that are present. However, the NRC inspectors found no evidence of verification of this predetermined criterion. The NRC inspectors also identified multiple errors which the audit could have caught. The licensee documented these errors under action requests: 2410039, 2422170, 2422453, 2424251, 2433350, 2447769, and 2463684.

Screening: The inspectors determined the performance deficiency was minor. The NRC inspectors screened the performance deficiency as minor because the NRC inspectors answered “no” to all the more than minor questions found in Inspection Manual Chapter (IMC) 0612 Appendix B, "Issue Screening Directions." The NRC inspectors consulted example 4.i of IMC 0612 Appendix E, "Examples of Minor Issues," and concluded that the performance deficiency would be minor because the performance deficiency would not impact the ability of the licensee to manually fight a fire.

Enforcement: The licensee has taken actions to restore compliance. This failure to comply with Point Beach Renewed Facility Operating License condition 4.F constitutes a minor violation that is not subject to enforcement action in accordance with the NRC's Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On April 4, 2024, the inspectors presented the integrated inspection results to Michael Durbin and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.01	Procedures	AOP-13C	Severe Weather Conditions	53
		MI 32.20	FPL/Point Beach Nuclear Plant Snow Removal Plan	8
		NP 7.2.29	External Events Program	10
		OM 3.30	Operations Snow Emergency Staffing	4
71111.04	Corrective Action Documents Resulting from Inspection	02480169	G-01 Drawing Inconsistencies with Field Conditions	02/28/2024
	Drawings	110E018 Sheet 1	P&ID Auxiliary Coolant System	71
		110E018 Sheet 2	P&ID Auxiliary Coolant System	22
		110E018 Sheet 3	P&ID Auxiliary Coolant System	45
		E-6, Sheet 1	125V DC Dist. System	68
		E-6, Sheet 2	125 Volt D.C. System	23
		E-6, Sheet 3	125V DC Dist. System	5
		M-209 Sheet 12	P&ID EM. Diesel Air Starting Sys. Point Beach N.P. Unit 1&2	29
		M-209 Sheet 15	P&ID Starting Air System Diesel Generator Building M-209 SH. 15 Point Beach N.P. Unit 1 & 2	13
		M-217 Sheet 1	P&ID Auxiliary Feedwater System	107
		M-219 Sheet 1	P&ID Fuel Oil System Point Beach N.P. Unit 1	53
		M-219 Sheet 3	P&ID Fuel Oil System Diesel Generator Building Point Beach N.P. Unit 1&2	17
		M-2217	P&ID Auxiliary Feedwater System	8
		M-227 Sheet 2	P&ID Glycol Cooling System Diesel Generator Building Point Beach N.P. Unit 1&2	11
	Miscellaneous	DBD-19	125 VDC System Design Basis Document	15
	Procedures	CL 13E Part 2	Auxiliary Feedwater Valve Lineup Motor Driven	60
		RMP 9046-1	Station Battery 92 Day, 12 Month Surveillance Tests	80
71111.05	Corrective Action Documents Resulting from Inspection	02477311	PFP-0-PAN - Pre-Fire Plan Protected Area North	01/23/2024
	Drawings	M2005-6-44,	Yellow Instrument Bus Fire Barrier Equip. Room "B" (226)	7

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		Sheet B	26' El. Ceiling	
		PBM-250	P&ID Battery & EE Room Rms. Vac.	22
	Fire Plans	PFP-0-PAB 26	Pre-Fire Plan Unit 1 & Unit 2 Auxiliary Building 26 ft	4
		PFP-0-PAN	Pre-Fire Plan Protected Area North (Inside the Fence)	2
	Miscellaneous	FPEE 1999-009	Undampered Ventilation Ducts in Significant Fire Barriers in the Control, Primary Auxiliary and Turbine Buildings	3
	Procedures	NP 1.9.14	Fire Protection Plan	27
		NP 8.4.11	Penetrating Barriers	28
71111.06	Calculations	2014-0007	Allowable Flood Levels	5
	Procedures	ARP 1C20 A 1-4	Auxiliary Building -19ft Sump/Area Level High	2
		NP 8.4.17	PBNP Flooding Program	37
		PC 37	Plant Sump Alarm Tests (Semiannual)	10
71111.07A	Calculations	2016-0009	PBNP SFP Heat Exchanger Performance Calculation	2
	Procedures	GL 89-13 Program Document	GL 89-13 Program Document	19
	Work Orders	40875661-01	Eddy Current Task 1 Work Standard	03/21/2024
71111.11Q	Miscellaneous	PBN LOC 24A 001E	Licensed Operator Continuing Training	0
	Procedures	AOP-21	PPCS Malfunction	21
		OP 2A	Normal Power Operation Unit 2	22
71111.12	Corrective Action Documents	02476908	Defective Fire Penetration Foam Kits	01/18/2024
	Procedures	DG-F02	Fire Barrier Penetration Seal Typical Detail Designs	5
		RMP 9393	Mixing and Installation of Two Component Silicones for Fire Barriers	16
	Work Orders	40810325-23	Foam Seal Penetration M-2005-6-20-E27	01/22/2024
71111.13	Miscellaneous		Work Activity Risk Management Plan for the Unit 1(2) Turbine Trip Block Testing	01/24/2024
			Work Activity Risk Management Plan for the 1(2) ICP 02.013 4.16KV Undervoltage Matrix Relays 31-Day Surveillance Test (TADOT)	01/02/2024
71111.15	Calculations	2010-0010	Acceptance Criteria for GAMP Sentinel Points	2

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Corrective Action Documents	02424405	High Motor Temperatures on 1P-11A	04/10/2022
		02438454	1P-11A Motor Temp High	10/02/2022
		02475191	~34 DPM Inboard Seal Leakage on 1P-11B, CCW Pump	12/22/2023
		02475646	Boric Acid Found In 2W-1B1/1B2 Fan Cubicle	01/02/2024
		02477201	Void Greater than NRI Found during UT Checks	01/22/2024
		02477218	Void Greater than NRI Found during UT Checks	01/22/2024
		02480468	1P-11A-M CCW Pump Motor Temperature Elevated	03/04/2024
	Corrective Action Documents Resulting from Inspection	02477288	NRC Identified: 2W-1B1 ACC Fan Discharge Temperature Trend	01/23/2024
	Drawings	110E018 Sheet 1	P&ID Auxiliary Coolant System	71
		M-2215 Sheet 1	P&ID Heating & Ventilation Point Beach N.P. Unit 2	39
		PBA-1137	Piping Isometric 1-P10A & B RHR Pump Bypass	0
	Miscellaneous		Boric Acid Leak Screening for 2W-1B1	
		EQCK-WEST-008	Checklist for Environmental Qualification Assessment of Electrical Equipment	3
		EQMR-CCW	Equipment Qualification Maintenance Requirement	12
		TLB-9	Component Cooling Water Surge	3
		WCAP-16631-NP-V1	Testing and Evaluation of Gas Transport to the Suction of ECCS Pumps	0
	Work Orders	40875121-01	1-TS-ECCS-002 Train B	01/22/2024
71111.18	Calculations	2002-0039	Fire Loading Calculation	3
		2022-04502	Point Beach Auxiliary Building Battery & Inverter Rooms Supplemental Cooling Calculation	1
	Engineering Changes	EC 296454	PAB Battery and Inverter Room Cooler Installation	0
	Miscellaneous	SL-017901	Fire Risk Evaluation of EC 296454 PAB Battery and Inverter Room Cooler Installation	0
71111.24	Calculations	2000-0036	pH of Post LOCA Sump and Containment Spray	3
		97-0231	Auxiliary Feedwater Pump Low Suction Pressure Trip Instrument Loop Uncertainty/Setpoint Calculation	3
	Corrective Action	02430785	SAT Analysis Work Order Documentation (NRC Identified)	06/27/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Documents	02472083	PMC in Screening for Extended Amount of Time	11/10/2023
		02473217	CA Untimely due to Inappropriate Closure to PMCR	11/28/2023
		02477533	Main Zurn Strainer Alarm	01/26/2024
		02478619	Sections Reperformed during IT 09A	02/08/2024
		2479695	Fuel Leak on Elbow Near F-180B G-02	02/21/2024
	Corrective Action Documents Resulting from Inspection	02471915	IST Program Inadequate Testing of MOVS	11/08/2023
		02477742	Use of Fluke 289 in Calibrations - NRC Identified	01/29/2024
		02479620	NRC Identified Completed Work Order Not in NAMS	02/21/2024
	Drawings	883D195 Sheet 7	Logic Diagrams Safeguards Actuation Signals	25
		M-207	P&ID Service Water	92
	Miscellaneous		Internal Correspondence: M&TE Equivalency and Related Items	02/12/2024
	Procedures	0-SOP-G02-001	Maintenance Operation For EDG G-02	22
		1ICP 2.3B	Reactor Protection System Logic Train B Surveillance Test	16
		1ICP 2.5B	Engineered Safety Features System Logic Train B Actuation Logic Test	16
		CAMP 226	Sodium Hydroxide: H2SO4 titration Method	8
		CAMP 226	Sodium Hydroxide: H2SO4 titration Method	9
		IT 09A	Cold Start of Turbine-Driven Auxiliary Feed Pump and Valve Test (Quarterly) Unit 2	86
		MA-AA-204-1000-10001	Preventative Maintenance Change Request (PMCR)	16
		OI 70	Service Water System Operation	83
		PI-AA-104-1000	Condition Reporting	39
		RMP 9043-23	Emergency Diesel Generator G-02 Mechanical Inspection	37
		TS 82	Emergency Diesel Generator G-02 Monthly	100
	Work Orders	40769618-01	SAT NaOH SR 3.06.07.3	01/14/2022
		40769627-01	SAT NaOH SR 3.06.07.3	01/14/2022
		40792544-01	SAT NaOH SR 3.06.07.3	07/13/2022
		40792548-01	SAT NaOH SR 3.06.07.3	07/13/2022
		40819818-01	SAT NaOH SR 3.06.07.3	01/11/2023
		40819820-01	SAT NaOH SR 3.06.07.3	01/11/2023

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		40830496-01	IT-05B, Cont Spray Pump/Vlv Testing (CSD), "Task Required to	10/25/2023
		40844646-01	G-02, 12Y Group A PMs	02/20/2024
		40844646-02	G-02, OPS PMT/RTS	02/21/2024
		40847898-01	SAT NaOH SR 3.06.07.3	07/13/2023
		40847905-01	SAT NaOH SR 3.06.07.3	07/13/2023
		40873341-01	SAT NaOH SR 3.06.07.3	01/24/2024
		40873344-01	SAT NaOH SR 3.06.07.3	01/24/2024
		40873347-01	1ICP 2.3B -- Reactor Protection Logic Test - Train B	01/11/2024
		40873352-01	1ICP 2.5B -- Safeguards Logic Test - Train B	01/11/2024
		40875095-01	1ICP-2.32 -- 1P-29 Auxiliary Feedwater Suction Pressure Trip	02/21/2024
		40875191-02	SW-02912-BS Inspect Zurn Strainer	01/24/2024
		40877343-01	IT-09A, 2P-29 AFP Cold Start Test/Valves	02/08/2024
		40963338-01	SW-02912-BS; Replace Limit Switch	02/13/2024
		40963338-02	SW-02912-BS; OPs PMT/RTS	01/31/2024
71114.06	Corrective Action Documents	02476726	Unexpected Simulator Behavior During EP Drill	01/16/2024
		02476761	Simulator Unexpectedly Set to Inactive During EP Drill	01/17/2024
		02478166	Develop JPM for SRO Staff on Emergency Live Operator Service	02/02/2024
		02478169	Non DEP ERO Notification Would Have Been Late	02/02/2024
		02478195	1Q24 EP Drill: SM Stumbled Announcement for Alert	02/02/2024
		02478446	EP Drill - SM Stumbled Announcement for Alert	02/06/2024
		02479344	EPIP 2.1 - Notifications - ERO, State and Counties, and NRC	02/16/2024
	Miscellaneous	1Q24 EP and Cyber Security Drill Combined Facility Critique	Powerpoint	02/12/2024
		1Q24 EP and IT Cyber Drill	Drill Spreadsheet	01/09/2024
		PBN LOC 24A 001E	As Found Training Scenario	0

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Procedures	EP 5.0	Organizational Control of Emergencies	69
		EP Appendix A	Emergency Response Organization Personnel Function and Responsibility	36
		EP Appendix B	Emergency Classification	34
		EP-AA-101-1000	Nuclear Division Drill and Exercise Procedure	34
		EPG 1.1	Performance Indicators (PI's) Guideline	14
		EPIP 1.1	Course of Actions	87
		EPIP 1.2	Emergency Classification	57
		EPIP 2.1	Notifications - ERO, State and Counties, and NRC	64
71152S	Corrective Action Documents	2391043	(P) PFP-0-PAB 8 - Pre-Fire Plan Primary (DOCDIST)	04/23/2021
		2410039	(P) PFP-2-CONT-FAC - Pre-Fire Plan Unit 2 (DOCDIST)	11/02/2021
		2422170	PFP-0-PAB 8 Updates Needed, NRC Question	03/21/2022
		2422453	(S) PFP-0-PAB 8 Pre-Fire Plan Primary Auxiliary Building	03/23/2022
		2424251	(S) PFP-1-CONT-FAC - Pre-Fire Plan Unit 1	04/08/2022
		2433350	(P) PFP-0-CB - Pre-Fire Plan Control BLDG (DOCDIST) - REV 6	08/02/2022
		2447769	PFP-0-PAB 8 - Pre-Fire Plan Primary Auxiliary (DOCDIST) - R6	02/07/2023
		2463684	(S) PFP-1-TB-26 - Pre-Fire Plan Unit 1 Turbine	08/02/2023
	Corrective Action Documents Resulting from Inspection	2482046	NRC Potential Minor Violation-PBN 2021 FP Audit Not per QATR	03/22/2024
	Procedures	NA-AA-203-1000	Performance of Nuclear Assurance Audits	20
		NP 1.9.14	Fire Protection Plan	23
		PFP-SOG-001	Pre-Fire Plan Standard Operating Guidelines	4
	Self-Assessments	PBN 21-006	Nuclear Assurance Audit, Fire Protection	08/27/2021