

From: Scott Wall
Sent: Tuesday, January 31, 2023 2:39 PM
To: Schultz, Eric
Cc: Phillabaum, Jerry; Mack, Jarrett; Mack, Kenneth
Subject: Final RAI (Volume 2) - 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 letters dated July 11, 2022, and January 11, 2023 (ML22192A152 and ML23011A280, respectively), 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 January 31, 2023, the NextEra staff indicated that a response to the RAIs would be provided by March 3, 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: SCPB, EEEB, EICB)

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.

Containment and Plant Systems Branch (SCPB) Audit Questions

SCPB-RAI-1 (Audit Question 25)

In Enclosure 1 of the LAR, Table E1-1 indicates for TS LCO Action 3.6.2.C that there are two emergency airlocks. Specifically, it lists one equipment hatch, one personnel airlock, and two emergency airlocks. FSAR, Chapter 5 indicates 2 personnel airlocks (one of which is emergency). FSAR Figures 5.1-4 and 5.1-5 are unreadable in the FSAR available at the NRC.

- a. Provide clear copies of the figures made available in the audit.
- b. Discuss why the LAR differs from the FSAR and confirm and correct.

SCPB-RAI-2 (Audit Question 26)

In Enclosure 1 of the LAR, Section 3, the licensee provides justification for TS LCO 3.6.2, "Containment Air Locks." However, it does not address the following issue: TSTF-505 Revision 2, for WOG LCO 3.6.2.C.2 reads "C.2 Verify a door is closed in the affected air lock." whereas the LAR's proposed Point Beach LCO 3.6.2.C.2 reads "C.2 Verify a bulkhead door and associated equalizing valve are closed in the affected air lock."

Provide additional information to explain: (1) how the equalizing valves function in relation to the bulkhead doors; and (2) why the difference in wording exists between the LCO of TSTF-505, Revision 2, and the LCO proposed in the LAR.

Electrical Engineering Branch (EEEB) Audit Questions

In Table E1-1 of Enclosure 1 of the LAR, the licensee lists each TS Required Action Condition proposed for the Point Beach RICT Program and documents information regarding the associated SSCs credited in plant safety analyses, the analogous PRA functions, and the results of the comparison. Questions EEEB-RAI-1 thru EEEB-RAI- 7 pertain to the information presented in Table E1-1

EEEB-RAI-1 (Audit Question 27)

For each LCO proposed under TS 3.8, "Electrical Power Systems," clarify if Table E1-1 is written on a per unit basis for "SSC Function(s)" (Column 3), and "PRA Success Criteria" (Column 6), given that sharing of electrical systems is found in UFSAR.

EEEB-RAI-2 (Audit Question 28)

The licensee stated that the "SSC Function(s)" (Column 3) for TS 3.8.1, Conditions A, B, C, D, and F is "Power onsite safeguards buses from offsite and onsite transmission networks to support normal, safe shutdown and accident mitigation conditions." Clarify why Column 3 is inconsistent with UFSAR by not listing four Class 1E 4.16 kV electrical buses since there are two of them per unit if this table addresses both Units 1 and 2.

EEEB-RAI-3 (Audit Question 29, rev 1) – TS LCO 3.8.1, Conditions A and B

Explain why Columns 2 and 3 are inconsistent with LCO for SSCs specifically covered by the LCO (not addressing high voltage (HV) station auxiliary transformers X03s or low voltage (LV) station auxiliary transformers X04s) in associated unit for respective LCO condition.

EEEB-RAI-4 (Audit Question 30, rev 1) – TS LCO 3.8.1, Conditions A and B

Explain why Column 6 is inconsistent with LCO by not listing minimum SSCs of those listed in Column 3 (e.g., either opposite unit's HV (X03) or LV station auxiliary transformer (X04), respectively, for Condition A or B) to achieve safe shut down for a design basis accident (DBA) in opposite unit.

EEEB-RAI-5 (Audit Question 31, rev 1) – TS LCO 3.8.1, Conditions C and D

Explain why Columns 2 and 3 are inconsistent with respective LCO in that (a) HV station auxiliary transformers X03s supplying buses A05 and A06 are not shown for TS LCO 3.8.1, Condition C and (b) also for LCO 3.8.1, Condition D including EDGs based on TS Bases (page 473).

EEEB-RAI-6 (Audit Question 32, rev 1) – TS LCO 3.8.1, Conditions C and D

Explain why Column 6 is inconsistent by not listing minimum required SSCs for respective LCO (a) like one unit's HV station auxiliary transformer (X03) supplying a singular bus A05 or A06 for TS LCO 3.8.1, Condition C and one unit's HV station auxiliary transformer (X03), or one EDG supplying that unit's bus A05 or A06 for TS LCO 3.8.1, Condition D.

EEEB-RAI-7 (Audit Question 33, rev 1) – TS LCO 3.8.1, Condition F

Explain why Column 6 is inconsistent with LCO by not listing minimum required SSCs one unit's HV station auxiliary transformer OR one EDG as supplying that unit's bus A05 or A06 as minimum SSCs for TS LCO 3.8.1, Condition F.

EEEB-RAI-8 (Audit Question 34, rev 1) – TS LCO 3.8.4, Condition A

Explain why Column 6 does not list minimum required SSCs in agreement with LCO in terms of subsystems (See TS Bases on page 504, 3rd full paragraph, 1st sentence about term “subsystem” and usage at Point Beach) and indicate if swing battery and battery chargers should be captured here.

EEEB-RAI-9 (Audit Question 35, rev 1) – TS LCO 3.8.7, Condition A

Explain why Column 6 does not list minimum number of inverters per channel per unit required for DBA and UFSAR Section 8.6.2 and TS Bases (page 520, 2nd paragraph, last 5 sentences).

Instrumentation & Controls Branch (EICB) Audit Questions

EICB-RAI-1 (Audit Question 36)

In Enclosure 1 of the LAR, Table E1-3(1), indicates the following:

RPS Function	Functional Unit	Channels to Trip
RCP breaker position – one loop	FU10a	1 out of 1 per loop
RCP breaker position – 2 loops	FU10b	
Underfrequency Bus A01, A02	FU12	1 out of 1 per bus

- a. Explain why it is not a loss of function to support the application of risk-informed completion time.
- b. Provide reference location in the UFSAR and RPS Design Basis Document (or in other available documentation) supporting the coincidence logic presented in the LAR.

EICB-RAI-2 (Audit Question 37)

In Attachment 2a of the LAR, the licensee proposes that the COMPLETION TIME for TS 3.3.1, “Reactor Protection System (RPS) Instrumentation,” CONDITION U change to “48 hours OR In accordance with the Risk Informed Completion Time Program.” CONDITION U applies to Functional Unit (FU) 19, “Reactor Trip Breaker Undervoltage and Shunt.” In Enclosure 1 of the LAR, Table E1-3(1) does not include information for FU19.

- a. Why is FU19 not included in the Table E1-3(1)?
- b. What is the coincidence logic for FU19?
- c. If the coincidence logic is X-out-of-X (such as 1-out-of-1 or 2-out-of-2), why it is not a loss of function to support the application of risk-informed completion time?
- d. Provide reference location in the UFSAR and RPS Design Basis Document (or in other available documentation) supporting the trip logic for FU19.

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