

February 22, 2002

Mr. Mark Reddemann
Site Vice President
Kewaunee and Point Beach Nuclear Plants
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2 - EMERGENCY
RESPONSE CAPABILITY - CONFORMANCE TO REGULATORY GUIDE 1.97,
REVISION 2 (TAC NOS. MB2782 AND MB2783)

Dear Mr. Reddemann:

By letter dated July 27, 2001, Nuclear Management Company, LLC (the licensee), requested approval of deviations and clarifications from Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," for the instrumentation that monitors containment isolation valve position at the Point Beach Nuclear Plant, Units 1 and 2.

The U.S. Nuclear Regulatory Commission (NRC) staff had previously evaluated conformance to Regulatory Guide 1.97 at Point Beach, Units 1 and 2, and concluded that it was acceptable, as documented in safety evaluations dated July 11, 1986, and September 29, 1992.

The NRC staff has reviewed the additional information provided in your letter dated July 27, 2001. The NRC staff finds the proposed deviations from Regulatory Guide 1.97 acceptable. The NRC staff, therefore, still finds that the Point Beach, Units 1 and 2, design is acceptable with respect to conformance to Regulatory Guide 1.97, Revision 2.

Enclosed is a copy of the NRC staff's supplemental safety evaluation summarizing the review of the licensee's July 27, 2001, submittal. This completes the NRC staff's review work for TAC Nos. MB2782 and MB2783.

If you have any questions regarding this matter, I may be reached at 301-415-1446.

Sincerely,

/RA/

John G. Lamb, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure: Safety Evaluation

cc w/encl: See next page

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DATE	02/21/02	02/21/02	02/05/02	02/22/02

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Point Beach Nuclear Plant, Units 1 and 2

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May 2001

SECOND SUPPLEMENTAL SAFETY EVALUATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
CONFORMANCE TO REGULATORY GUIDE 1.97
NUCLEAR MANAGEMENT COMPANY, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 50-266 AND 50-301

1.0 INTRODUCTION

The U.S. Nuclear Regulatory Commission (NRC) staff has completed its review of the Nuclear Management Company's, LLC (the licensee's), conformance to Regulatory Guide (RG) 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," Revision 2, for the Point Beach Nuclear Plant, Units 1 and 2, by providing the NRC staff's safety evaluation to the licensee on July 11, 1986, and a supplemental safety evaluation on September 29, 1992. The NRC staff found that the licensee's design was acceptable with respect to conformance to RG 1.97, Revision 2. By letter dated July 27, 2001, the licensee identified ambiguities and inconsistencies in the documentation concerning containment isolation valve position indication. The licensee has provided information to correct these ambiguities and inconsistencies and has requested that the NRC staff evaluate the issues concerning this instrumentation.

2.0 EVALUATION

RG 1.97 recommends that Category 1 position indication be provided in the control room for each containment isolation valve (excluding check valves) to provide the operator with information concerning the accomplishment of isolation of the containment. RG 1.97 also recommends that the information provided by each Category 1 instrument be recorded.

The licensee deviates from a strict interpretation of the Category 1 redundancy recommendation. Only active containment isolation valves (automatic valves that receive a containment isolation signal) have RG 1.97 position indication in the control room. Since redundant containment isolation valves are provided for each penetration, redundant indication per valve is not intended by the RG.

Remote-manual containment isolation valves do not perform an active containment isolation function that requires closure to maintain containment integrity. Each remote-manual containment isolation valve is installed in a containment penetration associated with a closed piping system. Since these valves do not perform a containment isolation function, RG 1.97 control room indication of their position is not needed.

ENCLOSURE

Local-manual containment isolation valves are administratively controlled and their containment isolation function is verified by the in-place administrative controls governing their positioning. Since these valves cannot reposition automatically, it is not necessary to reverify their position after a containment isolation signal. Therefore, RG 1.97 control room indication of the position of these valves is not necessary.

The licensee has not provided the recording capability of the position of containment isolation valves. The purpose of the control room indication of the position of containment isolation valves is to provide the operator with the status of containment penetrations. There would not be a significant benefit from recording the position information; thus, the recording of containment isolation valve position information is not necessary.

3.0 CONCLUSION

Based on review of the licensee's submittal, the NRC staff finds that the licensee has provided adequate justification for deviations from the RG 1.97, Revision 2, recommendations for the instrumentation that monitors containment isolation valve position at Point Beach, Units 1 and 2.

Principal Contributor: B. Marcus

Date: February 22, 2002