

November 18, 2004

Mr. Dennis L. Koehl
Site Vice President
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2, LICENSE RENEWAL
APPLICATION

Dear Mr. Koehl:

By letter dated February 25, 2004, Nuclear Management Company, LLC, (NMC or the applicant) submitted an application pursuant to 10 CFR Part 54, to renew the operating licenses for Point Beach Nuclear Plant (PBNP), Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC). The NRC staff is reviewing the information contained in the license renewal application (LRA) and has identified, in the enclosure, areas where additional information is needed to complete the review.

These RAs were discussed with your staff, Mr. Jim Knorr, and a mutually agreeable date for this response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-2232 or e-mail MJM2@nrc.gov.

Sincerely,

/RA/

Michael J. Morgan, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos.: 50-266 and 50-301

Enclosure: As stated

cc w/encls: See next page

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Point Beach Nuclear Plant, Units 1 and 2

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DISTRIBUTION: Ltr. To D. Koehl, RAI for the Review of the Pt. Beach Nuclear Plant, Units 1 and 2 License Renewal Application, Dated: November 18, 2004

Adams accession no.: **ML043280488**

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Project Manager

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POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION (LRA)
REQUEST FOR ADDITIONAL INFORMATION (RAI)

Section 3.3 - Aging Management of Auxiliary Systems

RAI 3.3-1

In LRA Tables 3.3.2-3, 3.3.2-7, and 3.3.2-9, heat exchangers and heater/coolers with heat transfer as the intended function are identified with only internal environments and associated aging effects. The external environment is listed as N/A. The applicant is requested to explain why the external environment and associated aging effects are not identified for these components. The applicant is also requested to address the similar question for the heat exchangers and heater/coolers in Tables 3.3.2-2, 3.3.2-3, 3.3.2-4, 3.3.2-5, 3.3.2-7, and 3.3.2-9 which have a pressure boundary as their intended function.

RAI 3.3-2

LRA Table 3.3.2-7 identifies no aging effects for neoprene expansion joints with an internal environment of air and wetted gas less than 140EF. Also, LRA Table 3.3.2-13 identifies the aging effects change in material properties and cracking for neoprene expansion joints with an internal environment of indoor with no air condition but does not identify an aging management program for these aging effects. For similar neoprene components in a warm, moist environments, the GALL report identifies the aging effects hardening and loss of strength and recommends a plant specific AMP to manage these aging effects. The applicant is requested to provide justification why no aging effects were identified for the internals of the expansion joints in Table 3.3.2-7 and why no aging management program is identified to manage the aging effects for the expansion joints in Table 3.3.2-13.

RAI 3.3-3

LRA Table 3.3.2-14 identifies the loss of material as an aging effect for carbon steel piping and fittings, and valve bodies in a raw water drainage environment. The applicant identifies the One-Time Inspection Program, LRA Section B2.1.13, to manage this aging effect. NUREG-1801, XI.M32 recommends one-time inspections as an appropriate aging management program where either an aging effect is not expected to occur but there is insufficient data to completely rule it out, or an aging effect is expected to progress very slowly. In cases where an aging effect is likely to occur, NUREG-1801 recommends periodic inspections. The staff does not consider a one-time inspection appropriate to manage the loss of material for carbon steel components in a raw water environment. The applicant is requested to justify use of a one-time inspection program to manage the loss of material for carbon steel components in a raw water environment.

RAI 3.3-4

LRA Table 3.3.2-7 identifies no aging effects for carbon and low alloy steel tanks in a concrete environment. Staff notes that concrete has a high pH which is a natural inhibitor for steel; however, concrete contaminated with chlorides or concrete in contact with acidic water is subject to loss of material due to general, pitting, and crevice corrosion. The applicant is requested to describe the basis for concluding that no aging effects occur in this environment.

Enclosure

Also state the specific tanks, the location of the tanks including the external environment, describe how the concrete interfaces with the tanks, and discuss if chlorides or acidic water can be present in this environment.

RAI 3.3-5

LRA Tables 3.3.2-7 and 3.3.2-9 identify the Periodic Surveillance and Preventive Maintenance (PSPM) program to manage the loss of heat transfer due to fouling for heat exchangers in oil, fuel oil, outdoor, and wetted air and gas environments. The monitoring and trending element in the applicant's PSPM states that inspections, examination, testing, and component replacement activities are performed on a specified frequency based on operating experience or other requirements. The applicant stated that the results of these surveillance and preventive maintenance activities are documented, and subject to review and approval. NUREG-1800, Section A.1.2.3.5 recommends that monitoring and trending activities be described, and they should provide predictability of the extent of degradation and thus effect timely corrective actions. Plant specific and/or industry operating experience may be considered in evaluating the appropriateness of the technique and frequency. The applicant is requested to describe the inspection technique and frequency. The inspection frequency should be justified by plant operating experience and should be adequate to detect the aging effects such that the intended function will be maintained during the period of extended operation.

RAI 3.3-6

Loss of preload is an aging effect for closure bolting in high temperature or high pressure systems. NUREG-1801, XI.M18, "Bolting Integrity" program provides aging management inspections for this aging effect. LRA section 3.3 for the auxiliary systems does not identify loss of preload as an aging effect for closure bolting. The applicant is requested to discuss why the loss of preload was not identified as an aging effects for auxiliary systems closure bolting and the inspections in NUREG-1801, XI.M18 were not credited for managing this aging effect. This RAI is also applicable for closure bolting in the ESF and SPCS.

Section 4.3.13 - Crane Load Cycle Limit

RAI 4.3.13-1

LRA Section 4.3.13, "Crane Load Cycle Limit," states that the load limit of the containment polar, auxiliary building, and turbine hall cranes are designed in accordance with CMAA-70 Class "A" service for 20,000 to 200,000 load cycles, and based on conservative usage assumptions, the cranes are expected to make 50,000 partial load lifts and less than 5,000 at or near rated load lift for the period of extended operation. The applicant is requested to provide the basis for concluding that 50,000 partial load lifts and less than 5,000 at or near rated load lift are in accordance with design of 20,000 to 200,000 load cycles.