



August 16, 2012

NRC 2012-0065
10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Point Beach Nuclear Plant, Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

License Amendment Request 270
Operations Manager Qualification Requirements

Pursuant to 10 CFR 50.90, NextEra Energy Point Beach, LLC (NextEra), hereby requests an amendment to Renewed Facility Operating Licenses DPR-24 and DPR-27 for the Point Beach Nuclear Plant (PBNP) Units 1 and 2, respectively. NextEra proposes to revise Technical Specification (TS) 5.3, "Facility Staff Qualifications," to clarify the required qualifications of the Operations Manager.

Enclosure 1 provides a detailed description and analysis of the proposed changes. Attachment 1 to Enclosure 1 provides the annotated TS pages showing the proposed changes. Attachment 2 to Enclosure 1 provides clean TS pages showing the proposed changes. There are no applicable TS Bases changes for the proposed change.

Approval of the proposed amendment is requested by March 1, 2013. NextEra will implement the amendment within 30 days of Commission Approval.

NextEra has evaluated the proposed amendment and has determined that it does not involve a significant hazards consideration pursuant to 10 CFR 50.92. The proposed TS change has been reviewed by the Plant Operations Review Committee.

In accordance with 10 CFR 50.91, a copy of this letter is being provided to the designated Wisconsin Official.

This letter contains no new Regulatory Commitments and no revisions to existing Regulatory Commitments.

I declare under penalty of perjury that the foregoing is true and correct.
August 16, 2012

Very truly yours,

NextEra Energy Point Beach, LLC

A handwritten signature in black ink, appearing to read "Larry Meyer", is written over the printed name and title.

Larry Meyer
Site Vice President

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
PSCW

ENCLOSURE 1

NEXTERA ENERGY POINT BEACH, LLC POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

LICENSE AMENDMENT REQUEST 270

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- 1. Proposed Technical Specification Changes (Mark-up)
- 2. Proposed Technical Specification Changes (Clean)

1.0 SUMMARY DESCRIPTION

This evaluation supports a request to amend Renewed Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant (PBNP) Units 1 and 2, respectively. NextEra Energy Point Beach, LLC (NextEra) proposes to revise Technical Specification (TS) 5.3, "Facility Staff Qualifications," to clarify the required qualifications of the Operations Manager.

2.0 DETAILED DESCRIPTION

This License Amendment Request is for an administrative change only. Current PBNP TS 5.3.1 requires each member of the facility staff meets or exceeds the minimum qualifications of American National Standards Institute (ANSI) N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel" (Reference 1). Section 4.2.2 of ANSI N18.1-1971 requires that the Operations Manager hold a Senior Reactor Operator's License at the time of the appointment to the active position.

PBNP TS 5.2.2(d) requires either the Operations Manager or the Assistant Operations Manager hold a Senior Reactor Operator's License at PBNP. The proposed change to PBNP TS 5.3.1 clarifies the required qualifications of the Operations Manager, stating the Operations Manager shall either hold a Senior Operator's license, have held a Senior Operator's license on a similar unit (PWR), or have been certified for equivalent senior operator knowledge. The proposed revision to TS 5.3.1 is consistent with the Operations Manager's Special Requirements contained in ANSI/ANS-3.1-1993, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants" (Reference 2). Additionally, the proposed revision that the Operations Manager have held a Senior Operator's license on a similar unit (PWR) is similar to the Operations Manager's Special Requirement (2) contained in ANSI/ANS-3.1-1987 (Reference 3), and amendments for both Salem Nuclear Generating Station (Salem) (Reference 4) and NextEra Energy Seabrook, LLC (Seabrook) (References 5 and 6).

2.1 Proposed Changes:

1. TS 5.3.1

Replace:

Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, as supplemented by Regulatory Guide 1.8, Revision 1, September 1975, for comparable positions, except for the education and experience eligibility requirements for license applicants, and changes thereto, shall be those previously reviewed by the NRC, specifically those referenced in NRC Safety Evaluation letter dated October 24, 2003.

With:

Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, as supplemented by Regulatory Guide 1.8, Revision 1, September 1975, for comparable positions, except:

- a) The education and experience eligibility requirements for license applicants, and changes thereto, shall be those previously reviewed by the NRC, specifically those referenced in NRC Safety Evaluation letter dated October 24, 2003.

- b) The Operations Manager shall meet one of the following:
 - i) Hold a Senior Operator's license, or
 - ii) Have held a Senior Operator's license on a similar unit (PWR), or
 - iii) Have been certified for equivalent Senior Operator knowledge.

Basis for the change: The proposed change is administrative in nature. As an alternate to holding a Senior Operator's License, as required by ANSI N18.1-1971, NextEra proposes to add two additional provisions to the requirements for the Operations Manager. The proposed provisions are consistent with the Operations Manager's Special Requirements contained in ANSI/ANS-3.1-1993. Additionally, the proposed revision that the Operations Manager have held a Senior Operator's license on a similar unit (PWR) is similar to the Operations Manager's Special Requirement (2) contained in ANSI/ANS-3.1-1987 (Reference 3), and amendments for both the Salem (Reference 4) and Seabrook (References 5 and 6). Although NextEra is not committed to either the 1987 or 1993 version of the ANSI/ANS-3.1 standard, the additional provisions proposed for TS 5.3.1 meet the Special Requirements of the standard. ANSI/ANS-3.1-1993 is endorsed by Regulatory Guide 1.8, Revision 3, "Qualification and Training of Personnel for Nuclear Power Plants" (Reference 7).

3.0 TECHNICAL EVALUATION

The Operations Manager is the safety conscience of the organization. The Operations Manager establishes and maintains an atmosphere that firmly establishes nuclear plant safety as the overriding priority in all aspects of plant operations, including alignment of all other plant organizations. He or she is also responsible for establishing high standards and expectations for operations activities that include fostering an environment of continuous learning and improvement, emphasizing effective communications, professionalism, adherence to high standards, a disciplined approach to operations, ownership of training, and both individual and organizational accountability.

The Assistant Operations Manager (AOM) is directly responsible for the performance and conduct of the Operating Crew on watch, and would act as the Operations Manager in the Operations Manager's absence. The AOM ensures safe operation of the plant as implemented by the operating crews, ensures adequate staffing and qualification, assists in the development, implementation, and maintenance of high standards and management expectations, and leads the resolution of personnel issues within the department that can not be resolved by shift supervision.

The AOM retains responsibility for directing the licensed operators and this responsibility cannot be delegated to a non-licensed individual. In the event that the AOM vacates this position, NextEra would continue to meet the requirements of 10 CFR 50.54. Should the individual in the position of AOM move to another position, the most likely course of action would be to promote one of the Shift Managers to the AOM position and conduct a turnover, as the station has done previously. In the event of a death, disability, or other condition that would cause an immediate vacancy in the AOM position, NextEra would take prompt action to fill the position as part of the normal management function. The availability of additional personnel that hold a senior operator license, such as a spare Shift Manager or Work Control Supervisor, ensure the ability to fill an AOM vacancy should the need arise.

Current PBNP TS 5.3.1 requires each member of the facility staff meets or exceeds the minimum qualifications of ANSI N18.1-1971. PBNP TS 5.2.2(d) requires either the Operations Manager or the AOM hold a Senior Reactor Operator's License at PBNP. The proposed change to PBNP TS 5.3.1 clarifies the required qualifications of the Operations Manager, stating the Operations Manager shall either hold a Senior Operator's license, have held a Senior Operator's license on a similar unit (PWR), or have been certified for equivalent senior operator knowledge. The proposed revision to TS 5.3.1 is consistent with the Operations Manager's Special Requirements contained in ANSI/ANS-3.1-1993. Additionally, the proposed revision that the Operations Manager have held a Senior Operator's license on a similar unit (PWR) is similar to the Operations Manager's Special Requirement (2) contained in ANSI/ANS-3.1-1987 (Reference 3), and amendments for both Salem (Reference 4) and Seabrook (References 5 and 6).

Although NextEra is not committed to either the 1987 or 1993 version of the ANSI/ANS-3.1 standard, the additional provisions proposed for TS 5.3.1 meet the Special Requirements of the standard.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.36, Technical Specifications, requires that each licensee operate in accordance with plant TSs. 10 CFR 50.36(c)(5) requires that each plant's TS contain administrative controls, which are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

10 CFR 50.54(l) requires the licensee to designate individuals to be responsible for directing the licensed activities of the licensed operators. Individuals designated by the licensee to be responsible for directing the licensed activities of the licensed operators shall be licensed as Senior Operators pursuant to 10 CFR 55.3.

4.2 Precedent

The proposed change is similar to approved License Amendments 192 and 175 for Salem, Units 1 and 2, respectively (Reference 4). Salem proposed a change permitting an individual that does not have a current Senior Operator's License to hold the Operations Manager position. The proposed change required the individual holding the Operations Manager position to hold a Senior Operator's License, have held a Senior Operator's License at a similar unit, or have been certified at an appropriate simulator for equivalent Senior Operator knowledge. Salem also stated that if the Operations Manager did not hold a current Senior Operator's License, the Assistant Operations Manager will hold a Senior Operator's License and meet the qualification requirements of ANSI N18.1-1971.

Seabrook proposed a similar change, removing the TS requirement for the Operations Manager to have previously held a Senior Reactor Operator License for Seabrook Station prior to assuming the Operations Manager position (Reference 5). Seabrook proposed an alternative requirement, adding provisions requiring the Operations Manager to hold a current Senior Operator License, have held a Senior Operator License on a similar unit (PWR), or have been certified for equivalent Senior Operator knowledge. The NRC approved the proposed change via Reference (6).

4.3 No Significant Hazards Consideration Determination

NextEra Energy Point Beach, LLC (NextEra) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

- 1) Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed amendment is for an administrative change only. No actual facility equipment or accident analyses will be affected by the proposed changes.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

This request is for administrative changes only. No actual facility equipment or accident analyses will be affected by the proposed changes and no failure modes not bounded by previously evaluated accidents will be created.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. This request is for administrative changes only. No actual plant equipment or accident analyses will be affected by the proposed changes. Additionally, the proposed changes will not relax any criteria used to establish safety limits, will not relax any safety system settings, and will not relax the bases for any limiting conditions of operation.

Therefore, the proposed amendment would not involve a significant reduction in a margin of safety.

Based on the above, NextEra concludes that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

The Plant Operations Review Committee has reviewed the proposed changes and concurs with this conclusion.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

- (1) American National Standards Institute, "Selection and Training of Nuclear Power Plant Personnel," ANSI N18.1-1971, Hinsdale, IL.
- (2) American Nuclear Society, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants," ANSI/ANS-3.1-1993, La Grange Park, IL.
- (3) American Nuclear Society, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants," ANSI/ANS-3.1-1987, La Grange Park, IL.
- (4) NRC letter to Public Service Electric and Gas Company, dated March 21, 1997, Salem Generating Station, Unit Nos. 1 and 2 (TAC Nos. M94448 and M94449) (ML011720298)
- (5) NextEra Energy Seabrook, LLC letter to NRC, dated March 16, 2010, Seabrook Station License Amendment Request 10-01, Operations Manager Qualification Requirements (ML100810098)
- (6) NRC letter to NextEra Energy Seabrook, LLC, dated September 2, 2010, Seabrook Station, Unit No. 1 – Issuance of Amendment Re: Operations Manager Qualification Requirements (TAC No. ME3585) (ML102170278)
- (7) U.S. Nuclear Regulatory Commission, "Qualification and Training of Personnel for Nuclear Power Plants," Regulatory Guide 1.8, Revision 3 (ML003706932)

**ENCLOSURE 1
ATTACHMENT 1**

**NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

LICENSE AMENDMENT REQUEST 270

**PROPOSED TECHNICAL SPECIFICATION CHANGES
(MARK-UP)**

5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

- 5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, as supplemented by Regulatory Guide 1.8, Revision 1, September 1975, for comparable positions, except: ~~for t~~
- a) The education and experience eligibility requirements for license applicants, and changes thereto, shall be those previously reviewed by the NRC, specifically those referenced in NRC Safety Evaluation letter dated October 24, 2003.
 - b) The Operations Manager shall meet one of the following:
 - i) Hold a Senior Operator's license, or
 - ii) Have held a Senior Operator's license on a similar unit (PWR), or
 - iii) Have been certified for equivalent Senior Operator knowledge.
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
- 5.3.3 In the event the position of Health Physicist is vacated and the proposed replacement does not meet all the qualifications of TS 5.3.1, but is determined to be otherwise well qualified, the concurrence of NRC shall be sought in approving the qualification of that individual.

**ENCLOSURE 1
ATTACHMENT 2**

**NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

LICENSE AMENDMENT REQUEST 270

**PROPOSED TECHNICAL SPECIFICATION CHANGES
(CLEAN)**

5.0 ADMINISTRATIVE CONTROLS

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- 5.3.3 In the event the position of Health Physicist is vacated and the proposed replacement does not meet all the qualifications of TS 5.3.1, but is determined to be otherwise well qualified, the concurrence of NRC shall be sought in approving the qualification of that individual.