



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

June 17, 2016

Mr. Eric McCartney
Site Vice President
NextEra Energy Point Beach, LLC
6610 Nuclear Road
Two Rivers, WI 54241

**SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 - ISSUANCE OF
AMENDMENTS RE: LICENSE AMENDMENT REQUEST 277, REVISION TO
STAFF AUGMENTATION TIMES IN THE POINT BEACH NUCLEAR PLANT
EMERGENCY PLAN (CAC NOS. MF6352 AND MF6353)**

Dear Mr. McCartney:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment Nos. 255 and 259 to Renewed Facility Operating License Nos. DPR-24 and DPR-27 for the Point Beach Nuclear Plant (PBNP), Units 1 and 2, respectively. The amendments consist of changes to the PBNP Emergency Plan (EP) in response to your application dated June 12, 2015, as supplemented by letters dated August 28, 2015, November 20, 2015, January 26, 2016, and February 9, 2016 (incorrectly dated as February 9, 2015).

These amendments would revise the PBNPEP to increase the staff augmentation response times for certain emergency response organization positions from 30 and 60 minutes to 60 and 90 minutes, respectively. Additionally, the changes include the relocation of the Emergency Director and Emergency Action Level Monitor positions from the Emergency Operations Facility to the Technical Support Center, and addition of an Assistant Emergency Operations Facility Manager position. The revision to Table 5.1, "Minimum Staffing for Emergencies," reflects an increase in minimum on-shift staffing by two positions and the augmentation staffing by an additional 15 positions from the current PBNPEP.

E. McCartney

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A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Chawla", with a stylized flourish at the end.

Mahesh L. Chawla, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosures:

1. Amendment No. 255 to DPR-24
2. Amendment No. 259 to DPR-27
3. Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NEXTERA ENERGY POINT BEACH, LLC

DOCKET NO. 50-266

POINT BEACH NUCLEAR PLANT, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 255
License No. DPR-24

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by NextEra Energy Point Beach, LLC (the licensee), dated June 12, 2015, as supplemented by letters dated August 28, 2015, November 20, 2015, January 26, 2016, and February 9, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, by Amendment 255, Renewed Facility Operating License No. DPR-24 is hereby amended to authorize revision to the Point Beach Nuclear Plant Site Emergency Plan as set forth in NextEra Energy Point Beach, LLC's application dated June 12, 2015, as supplemented by letters dated August 28, 2015, November 20, 2015, January 26, 2016, and February 9, 2016, and evaluated in the NRC staff's safety evaluation dated June 17, 2016.

3. This license amendment is effective as of its date of issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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William M. Dean, Director
Office of Nuclear Reactor Regulation

Date of issuance: June 17, 2016



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NEXTERA ENERGY POINT BEACH, LLC

DOCKET NO. 50-301

POINT BEACH NUCLEAR PLANT, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 259
License No. DPR-27

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by NextEra Energy Point Beach, LLC (the licensee), dated June 12, 2015, as supplemented by letters dated August 28, 2015, November 20, 2015, January 26, 2016, and February 9, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, by Amendment 259, Renewed Facility Operating License No. DPR-27 is hereby amended to authorize revision to the Point Beach Nuclear Plant Site Emergency Plan as set forth in NextEra Energy Point Beach, LLC's application dated June 12, 2015, as supplemented by letters dated August 28, 2015, November 20, 2015, January 26, 2016, and February 9, 2016, and evaluated in the NRC staff's safety evaluation dated June 17, 2016.

Enclosure 2

3. This license amendment is effective as of the date of issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "W. M. Dean", with a stylized flourish at the end.

William M. Dean, Director
Office of Nuclear Reactor Regulation

Date of issuance: June 17, 2016



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 255
TO RENEWED FACILITY OPERATING LICENSE NO. DPR-24
AND AMENDMENT NO. 259
TO RENEWED FACILITY OPERATING LICENSE NO. DPR-27
NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 50-266 AND 50-301

1.0 INTRODUCTION

By application to the U.S. Nuclear Regulatory Commission (NRC, Commission) dated June 12, 2015 (Reference 1), and as supplemented by letters dated August 28, 2015 (Reference 2), November 20, 2015 (Reference 3), January 26, 2016 (Reference 4), and February 9, 2016 (incorrectly dated as February 9, 2015) (Reference 5), NextEra Energy Point Beach, LLC (NextEra or the licensee) requested changes to the Point Beach Nuclear Plant Emergency Plan (PBNPEP) pursuant to Section 50.54(q) of Title 10 of the *Code of Federal Regulations* (10 CFR).

The proposed changes would revise the PBNPEP to increase the staff augmentation response times for certain emergency response organization (ERO) positions from 30 and 60 minutes to 60 and 90 minutes, respectively. Additionally, the proposed changes include the relocation of the Emergency Director and Emergency Action Level (EAL) Monitor positions from the Emergency Operations Facility (EOF) to the Technical Support Center (TSC), and add an Assistant Emergency Operations Facility Manager position. NextEra proposed a revision to PBNPEP Table 5.1, "Minimum Staffing for Emergencies," to reflect an increase in minimum on-shift staffing by two positions and the augmentation staffing by an additional 15 positions from the current PBNPEP.

The licensee's supplemental letters dated August 28, 2015, November 20, 2015, January 26, 2016, and February 9, 2016, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* (FR) on November 10, 2015 (80 FR 69714).

2.0 REGULATORY EVALUATION

The regulatory requirements and guidance on which the NRC staff based its acceptance are as follows:

2.1 Regulatory Requirements

The regulation at 10 CFR Section 50.47, "Emergency plans," sets forth emergency plan requirements for nuclear power plant facilities.

The regulation at 10 CFR 50.47(b) establishes the standards that the onsite and offsite emergency response plans must meet for the NRC staff to make a finding that there is reasonable assurance that the licensee can, and will, take adequate protective measures in the event of a radiological emergency. With respect to shift staffing and emergency plans, augmentation is addressed through 10 CFR 50.47(b)(1), which states, in part, that, "...each principal response organization has staff to respond and to augment its initial response on a continuous basis," and through 10 CFR 50.47(b)(2) which states, in part, that the emergency response plan must ensure that, "...adequate staffing to provide initial facility accident response in key functional areas is maintained at all times," and "timely augmentation of response capabilities is available..."

The regulation at 10 CFR 50.54(q)(1)(iii) defines emergency planning function and states the following:

[A] capability or resource necessary to prepare for and respond to a radiological emergency, as set forth in the elements of section IV, of appendix E to [Part 50] and, for nuclear power reactor licensees, the planning standards of §50.47(b).

The regulation at 10 CFR 50.54(q)(1)(iv) defines reduction in effectiveness and states the following:

[A] change in an emergency plan that results in reducing the licensee's capability to perform an emergency planning function in the event of a radiological emergency.

The regulation at 10 CFR 50.54(q)(3) states the following:

The licensee may make changes to its emergency plan without NRC approval only if the licensee performs and retains an analysis demonstrating that the changes do not reduce the effectiveness of the plan and the plan, as changed, continues to meet the requirements in appendix E to [Part 50] and, for nuclear power reactor licensees, the planning standards of §50.47(b).

The regulation at 10 CFR 50.54(q)(4) states, in part, the following:

The changes to a licensee's emergency plan that reduce the effectiveness of the plan as defined in paragraph (q)(1)(iv) of this section may not be implemented without prior approval by the NRC.

Appendix E to 10 CFR Part 50, Section IV, Part A, "Organization," states, in part,

The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization...

As required under 10 CFR 50.54(q)(4), the proposed changes in the application, as supplemented, regarding the increase in staff augmentation times for certain ERO positions were submitted to the NRC by the licensee for approval prior to implementation.

2.2 Guidance

Regulatory Guide 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors" (Reference 6), provides guidance on methods acceptable to the NRC staff for implementing specific parts of the NRC's regulations – in this case, 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. Regulatory Guide 1.101 endorses Revision 1 to NUREG-0654/FEMA-REP-1 (NUREG-0654), "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (Reference 7), which provides specific acceptance criteria for complying with the standards set forth in 10 CFR 50.47(b). These criteria provide a basis for NRC licensees, and State and local governments to develop acceptable radiological emergency plans and improve emergency preparedness.

Regulatory Guide 1.219, "Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors" (Reference 8), provides guidance on methods acceptable to the NRC staff for implementation of 10 CFR 50.54(q) as it relates to making changes to emergency response plans.

In NUREG-0654, Section II, "Planning Standards and Evaluation Criteria," Evaluation Criteria II.B.1 and II.B.5 address the 10 CFR 50.47(b)(2) planning standard. Evaluation Criteria II.B.1 specifies the onsite emergency organization of plant staff personnel for all shifts, and its relation to the responsibilities and duties of the normal shift complement. Evaluation Criteria II.B.5, states, in part, that:

Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." The minimum on-shift staffing levels shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1.

3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the licensee's regulatory and technical analyses in support of the proposed changes to the PBNPEP, as described in the application dated June 12, 2015, as

supplemented by letters dated August 28, 2015, November 20, 2015, January 26, 2016, and February 9, 2016. The NRC staff's technical evaluation is detailed below.

3.1 Background

By letter dated January 20, 1982 (Reference 9), the NRC staff required corrective actions following an Emergency Preparedness Appraisal at the PBNP. One of the corrective actions resulting from that appraisal was:

The licensee shall provide a description of how they intend to meet the minimum staffing guidance of NUREG-0654, Table B-1. This description shall clearly indicate how each Major Functional Area and task will be implemented at all times. Alternate measures shall be described for those Major Functional Areas not maintained 24 hours per day. Further, the licensee shall provide a description of a timely shift augmentation system meeting the goals of table B-1. The description of the minimum shift staffing and augmentation shall clearly indicate dates for implementation.

By letter dated February 18, 1982 (Reference 10), Wisconsin Electric Power Company (then the licensee) provided the following, specific to the corrective action regarding minimum staffing:

Attachment 1 summarizes how each Major Functional Area of Table B-1 is implemented at the Point Beach Nuclear Power Plant. Attachment 2 provides a direct comparison with Table B-1, including alternate measures for the Major Functional Areas not maintained 24 hours per day. These attachments, together with the exhibits and discussion related to personnel staffing, provides the description of a timely shift augmentation system meeting the goals of Table B-1.

By letter dated June 10, 1983 (Reference 11), the NRC staff concluded that the program for on-shift staffing and augmentation at PBNP met the requirements of 10 CFR 50.47(b)(2), Appendix E(IV)(A) to 10 CFR Part 50, and Supplement 1 to NUREG-0737, "Clarification of TMI Action Plan Requirements" (Reference 12).

By letter dated February 2, 1984 (Reference 13), the NRC staff detailed its review of Revision 20 to the PBNPEP, dated November 11, 1983. In regard to on-shift staffing and augmentation, the staff concluded that the licensee's emergency plan would meet the planning standards of 10 CFR 50.47(b) and the requirements of 10 CFR Part 50, Appendix E, if clarified to:

...indicate that the Communicator and Rad/Chem [Radiation/Chemistry] Technician are part of the normal plant organization; as well as clarify the timeliness with which additional personnel will be augmented as outlined in Table 2 of Supplement 1 to NUREG-0737.

Wisconsin Electric Power Company provided the required clarifications to the PBNPEP Section 5.0, "Organizational Control of Emergencies," in Revision 21, dated March 30, 1984, and Revision 22, dated August 31, 1984. Additionally, the NRC approved two changes to technical specifications associated with Operations Staffing, License Amendments Nos. 91

and 95 dated April 8, 1985 (Reference 14), and License Amendments Nos. 190 and 195 dated August 11, 1999 (Reference 15).

3.2 Major Functional Areas

In the license amendment request (LAR) dated June 12, 2015 (Reference 1), NextEra provided a justification for the proposed PBNPEP changes that included a detailed review of each Major Functional Area and task described in NUREG-0654, Table B-1.

The current PBNPEP describes the ERO as consisting of personnel staffing in:

- Control Room
- Operations Support Center (OSC)
- Technical Support Center (TSC)
- Offsite Radiation Support Facility (OSRPF)
- Emergency Operations Facility (EOF)
- Joint Public Information Center (JPIC)

Under the current PBNPEP, the goal is to have the TSC Manager, Rad/Chem Coordinator, Instrumentation and Controls (I&C) and Mechanical/Electrical Leaders, Chemist and Dose/Protective Action Recommendation (PAR) Coordinator positions staffed within 30 minutes with additional personnel reporting such that the TSC and EOF are activated within 60 minutes of declaration of an Alert or higher classification. Full activation of the OSC, TSC, OSRPF and the EOF is required within 60 minutes as described in the current PBNPEP. The JPIC staff is notified in parallel with the full ERO at the Alert classification level, and is activated when ready.

In the LAR dated June 12, 2015 (Reference 1), NextEra proposed to eliminate 30 minute responders to the TSC, OSC and OSRPF. The TSC, OSC and OSRPF will be activated within 60 minutes of declaration of Alert or higher EAL classification, and the EOF will be activated within 90 minutes of declaration of Alert or higher EAL classification. Notification and activation of the JPIC is unchanged in the proposed plan.

Although activation of the EOF is not required until a Site Area Emergency or higher classification is in effect per the guidance in NUREG-0654, the PBNPEP requires the OSC, TSC, OSRPF, and the EOF to be activated at the Alert level or higher classification.

The NRC staff's review of the proposed changes to the PBNPEP is described below.

3.2.1 Plant Operations and Assessment of Operational Aspects

The licensee is not requesting changes to this Major Functional Area. The current on-shift staffing for Plant Operations and Operations Aspects consists of:

<u>Position</u>	<u>Number of On-Shift Personnel</u>
• Shift Supervisor*	1
• Shift Foreman*	2
• Control Room Operators	4

- Auxiliary Operators

5

*Position is filled by a licensed Senior Reactor Operator (SRO)

3.2.2 Emergency Direction and Control

NUREG-0654, Table B-1 guidance indicates that the Shift Technical Advisor (STA), Shift Supervisor or designated facility manager should be assigned the Emergency Direction and Control function and they may be assigned other collateral functions. The overall direction of facility response may be transferred to the EOF Director when all centers are fully manned. NUREG-0654, Table B-1 designates an augmentation time of 60 minutes for the EOF Director.

The current and the proposed PBNPEP provide that the Shift Manager will initially perform the Emergency Direction and Control function until relieved. In the current PBNPEP, the Shift Manager orders activation of the emergency response facilities (ERFs) at the Alert or higher classification levels. In the LAR dated June 12, 2015 (Reference 1), NextEra requested a change to the Emergency Direction and Control Major Functional Area augmentation response times and position locations. Per the proposed PBNPEP, activation of the TSC would be required within 60 minutes of an Alert or higher declaration and activation of the EOF within 90 minutes. The changes in times, numbers and locations are depicted below:

Emergency Direction and Control		
Position	PBNPEP Current	Proposed
On-Shift	1- Shift Manager (Control Room)	1- Shift Manager (Control Room)
30 Minute Augmentation	1- TSC Manager (Technical Support Center)	
60 Minute Augmentation	2- Emergency Director, EAL Monitor (Emergency Operations Facility)	3- Emergency Director, TSC Manager, EAL Monitor (Technical Support Center)
90 Minute Augmentation		2- EOF Manager, EOF Assistant Manager (Emergency Operations Facility)

In the proposed PBNPEP, some functions and responsibilities are changed for personnel assigned the Emergency Direction and Control function, as described below.

With the relocation of the Emergency Director from the EOF to the TSC, the Emergency Director in the TSC is responsible for the following:

- Approval of Protective Action Recommendations emergencies for offsite agencies (until EOF is activated);
- Ensuring notification of Federal, state and county authorities (until EOF is activated);
- Request for Federal Assistance (until EOF is activated);
- Approval of classification/re-classification of emergencies;
- Authorization for the use of potassium iodide (KI); and

- Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum NextEra Energy Point Beach yearly administrative limits.

Upon activation of the EOF, the Emergency Director in the TSC will maintain the responsibility for assessment, evaluation, and classification/re-classification of emergencies.

The EOF Manager assumes the following responsibilities currently assigned to the Emergency Director, after EOF activation:

- Overall management and responsibility for the emergency response and recovery operations for the PBNP, with the non-delegable responsibility for decisions regarding:
 - a. Approval of Protective Action Recommendations for offsite agencies;
 - b. Ensuring notification of Federal, state, and county authorities;
 - c. Request for Federal assistance;
 - d. Authorizing the use of potassium iodide (KI); and
 - e. Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum PBNP yearly administrative levels.
- Serve as a senior company contact for offsite governmental agencies at the site (NRC, the Federal Emergency Management Agency, Wisconsin Emergency Management, county authorities); and
- Provide or delegate the responsibility to provide the JPIC personnel with information for use by the news media during an emergency.

In the proposed PBNPEP, the EAL Monitor is being relocated from the EOF to the TSC and will report within 60 minutes of declaration, with the same responsibilities as in the current plan, except for filling out the Nuclear Accident Reporting System (NARS) form, which becomes the responsibility of the Assistant EOF Manager.

The proposed PBNPEP also adds a new position, the Assistant EOF Manager, to the Emergency Direction and Control Major Functional Area. This position assumes the following responsibilities assigned to the EOF Manager in the current PBNPEP:

- Ensure the EOF has adequate staffing level to respond to the event;
- Maintain information flow with the Control Room and TSC;
- Ensure initial and continuing communications are maintained with offsite agencies;
- Interface with representatives from offsite emergency agencies and assist with information and communication needs; and
- Maintain accountability and assess/provide for the safety of EOF personnel.

Additionally, the Assistant EOF Manager is responsible for filling out the NARS form, currently a task for the EAL Monitor.

In an email request for additional information (RAI) dated July 28, 2015 (Reference 16), the NRC staff stated that no evaluation was provided regarding how the delay in EOF activation time impacts the TSC, which has to perform the functions of the EOF until activated. In its response (Reference 2), the licensee stated that it performed an evaluation and modified the proposed PBNPEP to relocate the Emergency Director, the EAL Monitor, and the communicator assigned to make notifications to the TSC. The licensee states that these changes continue to

maintain the current 60-minute time for transition of the classification and notification functions from the Control Room.

The NRC staff find that the extension in activation time for the EOF from 60 to 90 minutes from a declaration of an Alert or higher is acceptable due to the transfer of roles and responsibilities to the TSC as described above, which meets the requirements of the current PBNPEP and the guidance in NUREG-0654. Therefore, with the proposed changes, the PBNPEP continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

3.2.3 Notification and Communications

The guidance in NUREG-0654, Table B-1 provides that one communicator be assigned on-shift with a dedicated communicator augmenting the on-shift communicator within 30 minutes. The current and proposed PBNPEP assigns an on-shift individual to perform the Notification/Communication function with no other functions assigned. In the LAR dated June 12, 2015 (Reference 1), NextEra proposed to extend the transfer of communication by the Security Shift Supervisor to state and local responsibilities to the EOF from 60 to 90 minutes due to the proposed change in activation time for the EOF. The result of the changes to the Notification/Communications function would be the extension of the responsibility for communications with state and county officials in the TSC for an additional 30 minutes and the change in augmentation time for the ERF Communicator in the EOF to coincide staffing with the proposed 90 minute activation of the EOF.

In a letter dated November 20, 2015 (Reference 3), the licensee responded to an email request for additional information (RAI) dated October 6, 2015 (Reference 17), asking for clarification concerning the Security Shift Supervisor assigned to perform state and local notifications. The licensee stated that there are multiple security supervisors on shift qualified to perform the notifications and that these supervisors are not the same as the Security Shift Supervisor position defined in the Physical Security Plan. Table 5.1 of the PBNPEP was changed to define the position responsible for state and local notification as the Security Supervisor. Under the proposed PBNPEP, the Security Supervisor retains the notification function and will relocate to the TSC upon activation. This function is transferred to the State/County Communicator (EOF) when the EOF is activated.

The NRC staff finds these changes in augmentation times acceptable because the Security Supervisor has no other duties that would detract from the ability to perform the notification/communication function and the function performed by the ERF Communicator in the EOF is unchanged. Therefore, with the proposed changes, the PBNPEP continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

3.2.4 Radiological Accident Assessment and Support of Operational Accident Assessment/Protective Actions (In-Plant)

The function of onsite radiological assessment is to: review radiological conditions onsite using data from available instrumentation; assess the impact of changing radiological conditions on emergency classification; assist in accident assessment based upon those changing

radiological conditions, and recommend appropriate onsite protective measures. This Major Functional Area includes the following tasks:

1. EOF Director

The guidance in NUREG-0654, Table B-1 identifies one person to be available in 60 minutes to function as the Emergency Director. The current and proposed PBNPEP indicate that one person will be available within 60 minutes of an Alert or higher emergency declaration to relieve the Shift Manager as the Emergency Director. The licensee is transferring the Emergency Director position from the EOF to the TSC as described in Section 3.2.2 of this safety evaluation. The licensee is not requesting a change in augmentation time for the Emergency Director position; therefore, the function of this task is maintained as in the current PBNPEP.

2. Offsite Dose Assessment

The guidance in NUREG-0654, Table B-1 identifies one person to perform the offsite dose assessment function as a 30-minute augmented position. In the LAR dated June 12, 2015 (Reference 1), NextEra proposed to extend the Rad/Chem Coordinator response to the TSC from 30 to 60 minutes, and extend the Dose/PAR Coordinator response to the EOF from 30 to 90 minutes.

In the letter dated August 28, 2015 (Reference 2), NextEra stated that in the current PBNPEP, dose assessment is performed by an on-shift SRO on the unaffected unit and is transferred to the Dose/PAR Coordinator after activation of the EOF, with additional support from the Rad/Chem Coordinator in the TSC. The result of the changes to the offsite dose assessment function would be that the on-shift SRO would be responsible for performing dose assessment for up to 60 minutes after event declaration until relieved by the Rad/Chem Coordinator in the TSC.

The NRC staff issued an email RAI dated October 6, 2015 (Reference 17), asking if an evaluation was performed to determine what impact, if any, would an event affecting both units have on the ability of the Control Room personnel to perform offsite dose assessments. The licensee responded in a letter dated November 20, 2015 (Reference 3), and stated that it will add an additional on-shift staff member who will be assigned to perform dose assessment for the first 60 minutes following an event without any collateral duties. Thus, there will be no conflicts in response expectations. Table 5.1 in the proposed PBNPEP was revised to reflect this change.

In the LAR dated June 12, 2015 (Reference 1), the licensee described improvements made to the dose assessment capabilities since the previously approved PBNPEP was implemented that reduce data entry requirements and produce results more rapidly. These improvements include an upgraded plant computer system and replacement of the dose assessment software. NextEra states that it has the capability to perform dose projections from the Control Room, TSC, near-site EOF, and the Alternate [backup] EOF.

Based on the licensee's current dose assessment capability and the addition of a dedicated on-shift position to perform dose assessment, the NRC staff concludes that there is no loss of function or impact on the timing for performing dose assessment. Therefore, with the

proposed changes, the PBNPEP continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

3. Offsite and Onsite Surveys, In-Plant Surveys, and Radiation Protection

In the LAR dated June 12, 2015 (Reference 1), NextEra proposed the following changes:

Major Functional Area	Position Function/Title	Current On Shift	Current Augmentation (minutes)	Proposed On Shift	Proposed Augmentation 60 minutes
Support Staff	Radiation Protection (RP) Technician	1		2	
Protective Actions	Rad/Chem Coordinator		1 (30)		1
	RP Leader		1 (60)		1
	RP Technician (OSC)		- - -		4
	Chemistry Leader		- - -		1
	Radiochemistry Technician		1 (30)		1
	OSRPF Coordinator		1 (60)		1
	Field Team Leader		1 (60)		1
	Field Team #1		1 (60)		2
	Field Team #2		1 (60)		2

In the current PBNPEP, augmentation of the Radiation Protection Function is met by the Rad/Chem Coordinator within 30 minutes of declaration of an Alert or higher EAL and the Radiation Protection Leader, OSRPF Coordinator, Field Team Leader and 2 Field Team members within 60 minutes of declaration.

NextEra states that extension of the augmentation times for the Rad/Chem Coordinator from 30 to 60 minutes is acceptable due to the addition of a second RP Technician to the on-shift complement. Additionally, NextEra provides that computerized radiation protection work processes require personnel to sign-in electronically on radiation work permits and obtain electronic personnel dosimetry (EPDs) to enter radiologically controlled areas (RCAs). The same dosimetry is used as a key to unlock turnstiles to allow access to the RCA. An emergency re-entry process has been developed for use during a declared emergency. The EPDs' emergency dose and dose rate alarms are manually set as directed by the radiation work permits.

NextEra further states that installed plant radiological instrumentation is sufficient for monitoring for the release of radioactivity during the initial stages of an accident, and offsite survey data is used to validate the offsite dose assessment. Offsite monitoring would be accomplished by two teams, consisting of two personnel each, arriving within 60 minutes of declaration of an Alert or higher classification. This is consistent with the current and previously approved PBNPEPs.

Based on technological improvements for dose assessment, access control to radiologically controlled areas, the assignment of an additional RP Technician on-shift, and the extensive installed radiation monitoring system at PBNP, the NRC staff finds the extension of the augmentation time to be acceptable. Therefore, with the proposed changes, the PBNPEP continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

3.2.5 Plant System Engineering, Repair and Corrective Actions

This Functional Area includes the following tasks:

1. Technical Support

The guidance in NUREG-0654, Table B-1, identifies one on-shift STA, core/thermal hydraulics engineering expertise to be available in 30 minutes, and Electrical and Mechanical engineering expertise to be available in 60 minutes. Table 5.1 in the current PBNPEP includes an on-shift STA and an Engineering Coordinator reporting to the TSC within 60 minutes of declaration of an Alert or higher EAL.

In the LAR dated June 12, 2015 (Reference 1), NextEra proposed no changes to the Technical Support task in the PBNPEP. To support its position, the licensee describes improvements made to the site's original P250 plant system interface computer. In 1986, the P250 system was upgraded to a Combustion Engineering supplied Plant Process Computer System (PPCS). In 2002, the site installed the Westinghouse PPCS 2000. The number of plant operating parameters available on this system is larger due to the ability for the PPCS 2000 to communicate with another plant data acquisition system (equipment YR-4111) used on the secondary side of the plant. Benefits of the upgraded systems include:

- Programming capability for automated response such as indication of critical parameter alarms;
- Improved plant monitoring capability for Emergency Director functions;
- Fewer keystrokes required to switch between graphical displays;
- Real time plant data available through graphical displays; and
- PPCS functions are available to any desktop computer through the plant's site-wide internet.

Additionally, the PPCS basic functions are supported by instrument buses with backup power provided by vital buses.

By letter dated November 20, 2015 (Reference 3), the licensee responded to an RAI concerning how the proposed ERO maintains the need for technical support as described in a letter dated February 18, 1982 (Reference 9), and how the Engineering Coordinator position meets the intent for the major task of Technical Support in Table B-1 of NUREG-0654. NextEra modified its proposed Table 5.1 to eliminate the Engineering Coordinator as a required position and added a Reactor/Core Physics Engineer, a Mechanical Engineer and an Electrical Engineer responding to the TSC within 60 minutes of declaration of an Alert or higher classification.

Based on the improved monitoring systems available to the STA and the addition of the three engineers responding to the TSC within 60 minutes, the NRC staff finds the changes to the proposed Table 5.1 to be acceptable. Therefore, with the proposed changes, the PBNPEP continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

2. Repair and Corrective Actions

The guidance in NUREG-0654, Table B-1 specifies the major task of "Repair and Corrective Actions" to be fulfilled on-shift by a total of two personnel and "[m]ay be provided by shift personnel assigned other functions." One person would perform the function of a mechanic and one person would perform the function of an electrician. One electrician and one instrument and control (IC) technician would respond within 30 minutes to augment the ERO. One mechanic/radwaste operator and one additional electrician/I&C technician would respond within 60 minutes to augment the ERO.

The current PBNPEP has one I&C leader and one mechanical or electrical leader reporting to the OSC within 30 minutes of declaration of an Alert or higher EAL classification.

In the LAR dated June 12, 2015 (Reference 1), NextEra proposed to extend the augmentation times for the maintenance leaders from 30 to 60 minutes. The licensee further stated that the on-shift operators have the necessary training and expertise to perform troubleshooting and minor repairs during plant operations, and would be available to perform any minor troubleshooting and repair activities that may be needed. Due to the time needed to stabilize the plant and assess the event, the initial phase of accidents is not expected to involve a significant need for maintenance personnel. Once plant status is understood and the plant is in a stable condition, attention can be focused on corrective maintenance that may be needed to restore plant capabilities. Typically the initial stages of "corrective actions" will be minor or of limited scope, such as:

- Mechanical - Identification and operation of faulty valves, clogged filters, packing and seal adjustments, and troubleshooting;
- Electrical - Identification and correction of tripped breakers and overloads, and troubleshooting; and
- I&C - Identification and correction of controller and set point adjustment, and troubleshooting.

By letter dated November 20, 2015 (Reference 3), the licensee responded to an RAI concerning how the proposed ERO maintains the commitment for repair and corrective actions as described in a letter dated February 18, 1982 (Reference 10), and to clarify how the I&C and Mechanical/Electrical Leader positions meet the intent for the major task of Repair and Corrective Actions in Table B-1 of NUREG-0654. NextEra modified its proposed Table 5.1 to add a mechanic and an electrician responding within 60 minutes of declaration of an Alert or higher EAL and an I&C technician within 90 minutes of declaration. One Mechanical Supervisor, one Electrical Supervisor, and one I&C Supervisor will also augment within 90 minutes of declaration.

Based on the availability of on-shift operators with the necessary training and expertise to perform minor maintenance actions to mitigate an event until augmented and the addition of the augmenting maintenance personnel to the proposed Table 5.1, the NRC staff finds the requested changes to augmentation times to be acceptable. Therefore, with the proposed changes, the PBNPEP continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

3.2.6 Fire Fighting

The licensee is not requesting a change for the Fire Fighting Major Functional Area.

3.2.7 Rescue Operations and First Aid

The licensee is not requesting a change for the Rescue Operations and First Aid Major Functional Area.

3.2.8 Site Access Control and Personnel Accountability

The licensee is not requesting a change for the Site Access and Personnel Accountability Major Functional Area.

3.3 Summary

The NRC staff performed a technical and regulatory review of the proposed changes to the PBNPEP.

The licensee justified the extension in augmentation times for the Major Functional Areas in NUREG-0654, Table B-1, using its functional analysis of the Emergency Response Organization, the addition of two on-shift support staff positions for dose assessment and radiation protection, the relocation and re-assignment for certain tasks to maintain Major Functional Areas in the augmented organization, and an overall increase in the number of augmenting ERO staffing by 15 positions as described in Table 5.1, "Minimum Staffing for Emergencies," in the proposed PBNPEP.

The NRC staff finds that the proposed emergency plan changes meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, and provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. Therefore, the NRC staff concludes that the proposed PBNPEP changes to certain augmentation times, as described in the application dated June 12, 2015, as supplemented and as described in Table 5.1, of the PBNPEP in the letter dated February 9, 2016 (Reference 5), are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Wisconsin State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change the site emergency plan. The amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or

environmental assessment need be prepared in connection with the issuance of these amendments.

6.0 CONCLUSION

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

7.0 REFERENCES

1. NextEra Energy Point Beach, LLC letter to U.S. Nuclear Regulatory Commission, "Point Beach Units 1 and 2 – License Amendment Request 277, Revision to Staff Augmentation Times in the Emergency Plan," dated June 12, 2015 (Agencywide Documents Access Management System (ADAMS) Accession No. ML15166A042).
2. NextEra Energy Point Beach, LLC letter to U.S. Nuclear Regulatory Commission, "Response to Request for Supplemental Information for License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan," dated August 28, 2015 (ADAMS Accession No. ML15240A017).
3. NextEra Energy Point Beach, LLC letter to U.S. Nuclear Regulatory Commission, "Point Beach Units 1 and 2 – License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan Response to Request for Additional Information," dated November 20, 2015 (ADAMS Accession No. ML15328A481).
4. NextEra Energy Point Beach, LLC letter to U.S. Nuclear Regulatory Commission, "Point Beach Units 1 and 2 – License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan Supplemental Response to Request for Additional Information #5," dated January 26, 2016 (ADAMS Accession No. ML16026A372).
5. NextEra Energy Point Beach, LLC letter to U.S. Nuclear Regulatory Commission, "License Amendment Request 277, Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan Supplemental Response to Request for Additional Information #5 - Correction to Table 5.1," dated February 9, 2016 (ADAMS Accession No. ML16040A175).
6. Regulatory Guide 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors," dated October 1981 (ADAMS Accession No. ML090440294).
7. NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," dated November 1980 (ADAMS Accession No. ML040420012).

8. Regulatory Guide 1.219, "Guidance on Making Changes to Emergency Plans for Nuclear Power Plants," dated November 2011 (ADAMS Accession No. ML102510626).
9. U.S. Nuclear Regulatory Commission letter to Wisconsin Electric Power Company "Confirming Agreements Reached at 820114 Meeting re Corrective Actions to be Taken," dated January 20, 1982 (ADAMS Legacy Library Accession No. 8201260013).
10. Wisconsin Electric Power Company letter to U.S. Nuclear Regulatory Commission "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies and Point Beach Plant Conformance," dated February 18, 1982 (ADAMS Legacy Library Accession No. 8203030116).
11. U.S. Nuclear Regulatory Commission letter to Wisconsin Electric Power Company "SER, Min Staffing Levels for Emergency Situations," dated June 10, 1983 (ADAMS Legacy Library Accession No. 8306130431).
12. U.S. Nuclear Regulatory Commission, NUREG-0737, Supplement 1, "Clarification of TMI Action Plan Requirements," dated December 1982 (ADAMS Accession No. ML102560009).
13. U.S. Nuclear Regulatory Commission letter to Wisconsin Electric Power Company "Forwards SER 50-266/83-25 and 50-301/83-23," dated February 2, 1984 (ADAMS Legacy Library Accession No. 8402150368).
14. U.S. Nuclear Regulatory Commission letter to Wisconsin Electric Power Company, "Point Beach Plant License Amendments Nos. 91 & 95," dated April 8, 1985 (ADAMS Accession No. ML021930508).
15. U.S. Nuclear Regulatory Commission letter to Wisconsin Electric Power Company, "Point Beach Nuclear Plant, Units 1 and 2 – Issuance of Amendments Re: Administrative Control Changes (TSCR 211) (TAC Nos. MA4680 and MA4681)," dated August 11, 1999 (ADAMS Accession No. ML021980126).
16. U.S. Nuclear Regulatory Commission email to NextEra Energy Point Beach, LLC, "LIC-109 Acceptance Review for Point Beach Nuclear Plants Units 1 and 2 – License Amendment Request 277, Rev to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan – MF6352/MF6353," dated July 28, 2015 (ADAMS Accession No. ML15210A119).

17. U.S. Nuclear Regulatory Commission email to NextEra Energy Point Beach, LLC, "Request for Additional Information – Point Beach LAR 277 – Revision to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan," dated October 6, 2015 (ADAMS Accession No. ML15286A005).

Principal Contributors: M. Wasem, NSIR
M. Norris, NSIR

Date: June 17, 2016

E. McCartney

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A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/RA/

Maresh L. Chawla, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosures:

1. Amendment No. 255 to DPR-24
2. Amendment No. 259 to DPR-27
3. Safety Evaluation

cc: Listserv

DISTRIBUTION:

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RidsAcrr_MailCTR Resource

RidsNrrDorlDpr Resource

RidsRgn3MailCenter Resource

RidsNrrLAMHenderson Resource

ADAMS Accession No.: ML16118A154

***Concurrence via email**

OFFICE	DORL/LPL3-1/PM	DORL/LPL3-1/LA	NSIR/DPR	OGC – NLO w/comments
NAME	MChawla	MHenderson SRohrer	JAnderson*	JLindell
DATE	05/05/16	05/03/16, 06/06/16	04/22/16	05/20/16
OFFICE	DORL/LPL3-1/BC	NRR/DORL/D	NRR/D	DORL/LPL3-1/PM
NAME	DWrona	ABoland (EBenner for)	WDean (BMcDermott for)	MChawla
DATE	06/07/16	06/09/16	06/17/16	06/17/16

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