

## NRR-PMDAPEm Resource

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**From:** Chawla, Mahesh  
**Sent:** Thursday, April 28, 2016 1:42 PM  
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**Cc:** Wrona, David; Dennig, Robert; Klein, Alex; West, Khadijah; Sweat, Tarico; Oliver, David; Barclay, Kevin; Cameron, Jamnes; Rutkowski, John; Bloom, Steven  
**Subject:** LIC-109 Acceptance Review - LAR 282, Modify the Wording of Surveillance Requirement 3.4.12.7 Associated with the Power-operated Relief Valves - MF7441/MF7442  
**Attachments:** MF7440\_41\_Supplemental Information Request.docx

By letter dated March 10, 2016 (ADAMS Accession No.ML16070A118), NextEra Energy Point Beach (the licensee) submitted a license amendment request (LAR) for Point Beach Nuclear Plant, Units 1 and 2. The proposed LAR 282 would modify the wording of Surveillance Requirement (SR) 3.4.12.7 associated with the Power-operated Relief Valves, by replacing the words “gas bottles” with the word “supply.” In its application, the licensee characterized the proposed TS change as ***non-technical***.

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the proposed change is ***not editorial*** and the information delineated in the enclosure to this letter is necessary to enable the NRC staff to make an independent assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that the licensee supplement the application to address the information requested in the enclosure by a mutually agreed upon date during a teleconference to discuss this supplemental information. This will enable the NRC staff to complete its detailed technical review. If the information responsive to the NRC staff's request is not received by ***the requested date to be determined during a teleconference with the licensee***, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC staff will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Please arrange a teleconference with the NRC staff to discuss this information. If you have any questions, please contact me. Thanks

Mahesh Chawla  
Project Manager

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**Subject:** LIC-109 Acceptance Review - LAR 282, Modify the Wording of Surveillance Requirement 3.4.12.7 Associated with the Power-operated Relief Valves - MF7441/MF7442  
**Sent Date:** 4/28/2016 1:41:54 PM  
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**From:** Chawla, Mahesh

**Created By:** Mahesh.Chawla@nrc.gov

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**Post Office:**

Files	Size	Date & Time
MESSAGE	3044	4/28/2016 1:41:00 PM
MF7440_41_Supplemental Information Request.docx		25605

**Options**  
**Priority:** Standard

<b>Return Notification:</b>	No
<b>Reply Requested:</b>	No
<b>Sensitivity:</b>	Normal
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<b>Recipients Received:</b>	

**Request for Supplemental Information**  
**Point Beach Nuclear Plant, Units 1 and 2**  
**Docket Nos. 50-266 and 50-301**

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(c)(3), surveillance requirements (SRs) are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

The licensee stated in Section 2.0 of its application, dated March 10, 2016:

The proposed change to SR 3.4.12.7 would apply to the current configuration where the nitrogen gas supply is provided by bottles. Similarly, the revised SR would apply if NextEra implements a future design change that replaces the nitrogen gas bottles with accumulators or another type of appropriate container.

In its application, the licensee characterized the proposed technical specification (TS) change as non-technical. However, in October 2015, the licensee brought to the attention of NRC staff the need for this TS change due to a planned plant modification. The modification is a commitment tied to a separate application (dated June 26, 2013, and currently under NRC review) requesting to transition Point Beach to 10 CFR 50.48(c), "National Fire Protection Association Standard NFPA 805."

Essentially, the proposed TS change is linked to a technical change. It is not merely editorial. An application to revise a TS related to a design change must include adequate design information and technical justification. For that reason, NRC staff will need more information than was provided to properly evaluate whether SR 3.4.12.7 will continue to meet 10 CFR 50.36(c)(3) for the new nitrogen supply design. Please provide sufficient detail and technical justification of the related design change for the TS change.

The nitrogen supply design will be reviewed using Section 9.3.1, "Compressed Air System" of the Standard Review Plan (SRP). Describe how the new nitrogen supply will continue to meet all regulatory requirements (e.g., General Design Criteria 1, 2, and 5) identified within SRP 9.3.1. Also, provide a system description and P&IDs to identify differences in the current and proposed nitrogen supply system.

**Commented [WD1]:** Do we need full blown P&IDs?  
Can we just ask for simplified system drawings?

Enclosure