

**POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 (PBN)
SUBSEQUENT LICENSE RENEWAL APPLICATION (SLRA)
REQUEST FOR ADDITIONAL INFORMATION (RAI)
SAFETY - SET 13**

SLRA Section B.2.3.23, “External Surfaces Monitoring of Mechanical Components”

RAI RAI B.2.3.23-1

Regulatory Basis

Section 54.21(a)(3) of Title 10 of the *Code of Federal Regulations* (10 CFR) requires an applicant to demonstrate that the effects of aging for structures and components will be adequately managed so that the intended function(s) will be maintained consistent with the current licensing basis for the period of extended operation. One of the findings that the U.S. Nuclear Regulatory Commission (NRC) staff must make to issue a renewed license (10 CFR 54.29(a)) is that actions have been identified and have been or will be taken with respect to managing the effects of aging during the period of extended operation on the functionality of structures and components that have been identified to require review under 10 CFR 54.21, such that there is reasonable assurance that the activities authorized by the renewed license will continue to be conducted in accordance with the current licensing basis. 10 CFR 54.21(d) requires that the UFSAR supplement for the facility contain a summary description of the programs and activities for managing the effects of aging and the evaluation of time-limited aging analyses for the period of extended operation determined by 10 CFR 54.21(a) and (c), respectively. In order to complete its review and enable making a finding under 10 CFR 54.29(a), the staff requires additional information in regard to the matters described below.

Background

NextEra submitted an annual update to the Point Beach SLRA by letter dated November 30, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21334A293). In the update, the applicant modified SLRA Table 3.3.2-12 by adding carbon steel valve bodies exposed externally to raw water and manage loss of material using the External Surfaces Monitoring of Mechanical Components program. Additionally, this item was given a note “E” and a plant-specific note “2”, which states, “[t]he External Surfaces Monitoring of Mechanical Components (B.2.3.23) AMP [is] used to manage loss of material of the submerged forbay inlet motor operated valves.”

SLRA Section B.2.3.23, “External Surfaces Monitoring of Mechanical Components,” program states, in part, “[v]isual inspections are performed during system inspections and walkdowns.

The inspection parameters for metallic components include material condition, which consists of evidence of rust, general, pitting, and crevice corrosion; surface imperfections such as cracking and wastage, coating degradation such as cracking, flaking, or blistering; evidence of insulation damage or wetting, leakage, and accumulation of debris on heat exchanger surfaces.”

Issue

As noted in the SLRA Section 16.2.2.23, periodic visual inspections are performed at a frequency that do not exceed the refueling outage interval, for metallic, polymeric, and insulation jacketing (insulation when not jacketed). It is not clear to the NRC staff how the visual inspections performed during system inspections and walkdowns will be effective on submerged components and at a frequency that does not exceed the refueling outage interval.

Request

Provide clarification on how visual inspections for loss of material during system inspections and walkdowns, at a frequency that does not exceed the refueling outage interval, will be effective on components that are submerged.