UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

June 16, 2017

Mr. Robert Coffey
Site Vice President
NextEra Energy Point Beach, LLC
6610 Nuclear Road
Two Rivers, WI 54241–9516

SUBJECT: POINT BEACH NUCLEAR POWER PLANT—NRC TEMPORARY INSTRUCTION 2515/191, MITIGATION STRATEGIES, SPENT FUEL POOL INSTRUMENTATION AND EMERGENCY PREPAREDNESS INSPECTION REPORT 05000266/2017008; 05000301/2017008

Dear Mr. Coffey:

On May 12, 2017, the U.S. Nuclear Regulatory Commission (NRC) completed Temporary Instruction (TI) 2515/191, "Inspection of the Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans" inspection at your Point Beach Nuclear Power Plant, Units 1 and 2. On May 12, 2017, the NRC inspection team discussed the results of this inspection with you and other members of your staff. The enclosed report represents the results of this inspection.

The inspection examined activities conducted under your license as they relate to the implementation of mitigation strategies and spent fuel pool instrumentation orders (EA–12–049 and EA–12–051) and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans, your compliance with the Commission's rules and regulations, and with the conditions of your operating license. Within these areas, the inspection involved examination of selected procedures and records, observation of activities, and interviews with station personnel.

The NRC inspectors did not identify any findings or violations of more than minor significance during this inspection.

This letter, its enclosure, and your response, (if any), will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Ann Marie Stone, Team Leader
Technical Support Staff
Division of Reactor Projects

Docket Nos. 50–266; 50–301
License Nos. NPF–24, NPF–27

Enclosure:
IR 05000266/2017008; 05000301/2017008

cc: Distribution via LISTSERV®

Letter to Robert Coffey from Ann Marie Stone dated June 16, 2017.

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos:	50–266; 50–301
License Nos:	NPF–24, NPF–27
Report Nos:	05000266/2017008; 05000301/2017008
Licensee:	NextEra Energy Point Beach, LLC
Facility:	Point Beach Nuclear Plant Units 1 and 2
Location:	Two Rivers, WI
Dates:	May 8 through May 12, 2017
Inspectors:	B. Bartlett, Project Engineer (Team Lead) D. Reeser, Operations Engineer V. Meghani, Senior Reactor Inspector K. Barclay, Resident Inspector
Approved by:	A. Stone, Team Leader Technical Support Staff Division of Reactor Projects

Enclosure

SUMMARY

Inspection Report 05000266/2017008; 05000301/2017008, 05/08/2017 – 05/12/2017, Point Beach Nuclear Power Plant Units 1 and 2; Temporary Instruction 2515/191 Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans.

This inspection was performed by a resident inspector and three U.S. Nuclear Regulatory Commission (NRC) regional inspectors. No findings of significance or violations of NRC requirements were identified during this inspection. The significance of inspection findings is indicated by their color (i.e., greater than Green, or Green, White, Yellow, Red) and determined using Inspection Manual Chapter 0609, "Significance Determination Process," dated April 29, 2015. Cross-cutting aspects are determined using Inspection Manual Chapter (IMC) 0310, "Aspects Within the Cross-Cutting Areas," dated December 4, 2014. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG–1649, "Reactor Oversight Process," dated July 2016.

NRC–Identified and Self-Revealing Findings

None.

REPORT DETAILS

4. OTHER ACTIVITIES

4OA5 Other Activities (TI 2515/191)

The objective of Temporary Instruction (TI) 2515/191, "Inspection of the Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans," is to verify the licensee has adequately implemented the mitigation strategies as described in the licensee's Final Integrated Plan Revision 0 (ADAMS Accession No. ML15350A085), and the NRC's safety evaluation (ADAMS Accession No. ML16241A000) and to verify the licensee installed reliable water-level measurement instrumentation in their spent fuel pool. The purpose of this TI was also to verify the licensee had implemented Emergency Preparedness (EP) enhancements as described in their site-specific submittals and NRC safety assessments, including multi-unit dose assessment capability and enhancements to ensure staffing is sufficient and communications can be maintained during such an event.

The inspection also verifies plans for complying with NRC Orders EA–12–049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (ADAMS Accession No. ML12054A736) and EA–12–051, Order Modifying Licenses With Regard to Reliable Spent Fuel Pool Instrumentation (ADAMS Accession No. ML12054A679) are in place and are being implemented by the licensee. Additionally, the inspection verified implementation of staffing and communications information provided in response to the March 12, 2012, request for information letter and multiunit dose assessment information provided per COMSECY–13–0010, Schedule and Plans for Tier 2 Order on Emergency Preparedness for Japan Lessons Learned, dated March 27, 2013, (ADAMS Accession No. ML12339A262).

The inspectors discussed the plans and strategies with plant staff, reviewed documentation, and where appropriate, performed plant walk downs to verify the strategies could be implemented as stated in the licensee's submittals and the NRC staff prepared safety evaluation. For most strategies, this included verification that the strategy was feasible, procedures and/or guidance had been developed, training had been provided to plant staff, and required equipment had been identified and staged. Specific details of the team's inspection activities are described in the following sections. This inspection closes TI 191 for the Point Beach facility.

.1 Mitigation Strategies for Beyond-Design Basis External Events

a. Inspection Scope

The inspectors examined the licensee's established guidelines and implementing procedures for the beyond-design basis mitigation strategies. The inspectors assessed how the licensee coordinated and documented the interface/transition between existing off-normal and emergency operating procedures with the newly developed mitigation strategies. The inspectors selected a number of mitigation strategies and conducted plant walk downs with licensed operators and responsible plant staff to assess: the adequacy and completeness of the procedures; familiarity of operators with the procedure objectives and specific guidance; staging and compatibility of equipment;

and the practicality of the operator actions prescribed by the procedures, consistent with the postulated scenarios.

The inspectors verified a preventive maintenance program had been established for the Diverse and Flexible Coping Strategies (FLEX) portable equipment and periodic equipment inventories were in place and being conducted. Additionally, the inspectors examined the introductory and planned periodic/refresher training provided to the Operations staff most likely to be tasked with implementation of the FLEX mitigation strategies. The inspectors also reviewed the introductory and planned periodic training provided to the Emergency Response Organization personnel. Documents reviewed are listed in the attachment.

b. Assessment

Based on samples selected for review, the inspectors verified the licensee satisfactorily implemented appropriate elements of the FLEX strategy as described in the plant specific submittal(s) and the associated safety evaluation and determined the licensee is generally in compliance with NRC Order EA–12–049. The inspectors verified the licensee satisfactorily:

- developed and issued FLEX Support Guidelines (FSG) to implement the FLEX strategies for postulated external events;
- integrated their FSGs into their existing plant procedures such that entry into and departure from the FSGs were clear when using existing plant procedures;
- protected FLEX equipment from site-specific hazards;
- developed and implemented adequate testing and maintenance of FLEX equipment to ensure their availability and capability;
- trained their staff to assure personnel proficiency in the mitigation of beyond-design basis events; and
- developed the means to ensure the necessary off-site FLEX equipment would be available from off-site locations.

The inspectors verified non-compliances with current licensing requirements, and other issues identified during the inspection were entered into the licensee's corrective action program as appropriate.

.2 Spent Fuel Pool Instrumentation

a. Inspection Scope

The inspectors examined the licensee’s newly installed spent fuel pool instrumentation. Specifically, the inspectors verified the sensors were installed as described in the plant specific submittals and the associated safety evaluation and that the cabling for the power supplies and the indications for each channel are physically and electrically separated. Additionally, environmental conditions and accessibility of the instruments were evaluated. Documents reviewed are listed in the attachment.

b. Assessment

Based on samples selected for review, the inspectors determined the licensee satisfactorily installed and established control of the spent fuel pool (SFP) instrumentation as described in the plant specific submittal(s) and the associated safety

evaluation and determined the licensee is generally in compliance with NRC Order EA–12–051. The inspectors verified the licensee satisfactorily:

- installed the SFP instrumentation sensors, cabling and power supplies to provide physical and electrical separation as described in the plant specific submittal(s) and safety evaluation;
- installed the SFP instrumentation display in the location, environmental conditions and accessibility as described in the plant specific submittal(s); and
- trained their staff to assure personnel proficiency with the maintenance, testing, and use of the SFP instrumentation.

The inspectors verified non-compliances with current licensing requirements, and other issues identified during the inspection were entered into the licensee's corrective action program.

c. Findings

No findings were identified.

.3 Staffing and Communication Request for Information

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walk downs, the inspectors verified the licensee has implemented required changes to staffing, communications equipment and facilities to support a multi-unit extended loss of AC power (ELAP) scenario as described in the licensee's staffing assessment and the NRC safety assessment. The inspectors also verified the licensee has implemented multi-unit dose assessment (including releases from spent fuel pools) capability using the licensee's site-specific dose assessment software and approach as described in the licensee's multi-unit dose assessment submittal. Documents reviewed are listed in the attachment.

b. Assessment

The inspectors reviewed information provided in the licensee's multi-unit dose submittal and in response to the NRC's March 12, 2012, request for information letter and verified that the licensee satisfactorily implemented enhancements pertaining to Near-Term Task Force Recommendation 9.3 response to a large scale natural emergency event that results in an ELAP to all site units and impedes access to the site. The inspectors verified the following:

- the licensee satisfactorily implemented required staffing change(s) to support a multi-unit ELAP scenario;
- EP communications equipment and facilities are sufficient for dealing with a multi-unit ELAP scenario; and
- the licensee implemented multi-unit dose assessment capabilities (including releases from spent fuel pools) using the licensee's site-specific dose assessment software and approach.

The inspectors verified non-compliances with current licensing requirements, and other issues identified during the inspection were entered into the licensee's corrective action program.

4OA6 Management Meeting

.1 Exit Meeting Summary

On May 12, 2017, the inspectors presented the inspection results to Mr. R. Coffey and other members of the licensee's staff. The licensee acknowledged the issues presented. The inspectors confirmed none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

R. Craven, Plant General Manager
J. Wilson, Operations Director
B. Woyak, Licensing Manager
B. Fromm, Projects Site Manager
D. Shepherd, Design Engineering Manager
E. Schmidt, Programs Engineering Manager
R. Seizert, Emergency Preparedness Manager
R. Welty, Radiation Protection Manager
D. Peterson, Training Manager
E. Schultz, Operations Assistant Manager
M. Holzmann, Operations Assistant Manager
M. Wilcox, Online Manager
L. Christensen, Licensing Project Manager
C. Gerbers, Projects Engineering Supervisor
S. Manthei, Licensing Senior Engineer
K. Hilliker, Emergency Preparedness Coordinator
A. Guenther, Programs Engineering Senior Engineer
B. Griffin, Senior Communications Specialist

U.S. Nuclear Regulatory Commission

T. Hartman, Senior Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

None.

LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply the NRC inspector reviewed the documents in their entirety, but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

Condition Reports Initiated as a Result of the Inspection

- 02204113; Revise NP 7.7.36 to Enhance Attachment M Regarding MRE Quantities; 5/09/2017
- 02204145; FLEX Staging Area C Unavailable due to Construction of a Hanger; 5/09/2017
- 02204559; Question Regarding the Adequacy of Operators Performing Monthly Walkdowns of the FSB Instead of Weekly or Daily Rounds; 5/11/2017
- 02204380; Procedure Change Request to Remove a Reference to a Six Inch Instrument Loop Uncertainty; 5/10/2017
- 02204149; FLEX Inspection – Typographical Errors in FSG-4; 5/09/2017
- 02204407; Discharge Pressure Gauge Found Isolated on Z-2004B; 5/10/2017
- 02204409; Error Found in the Procedure Kept with Z-2004A; 5/10/2017
- 02204753; Question on Low Temperature Limits on Pumps Z-2003A and B; 5/12/2017

Condition Reports Reviewed

- 02150373; 0Z-2001A FLEX Portable Generator Engine Oil Change Required; 8/17/2016
- 02053292; SFP Level Channel Check Maximum Setpoint; 6/10/2015
- 02139391; Z-2004B Outboard Pump Bearing Sample; 6/21/2016
- 02184365; FLEX Primary Pump Storage Area Access and Seismic Concern; 2/08/2017
- 02182800; FLEX 0Z-2000A Generator Loaded Tests Not Completed; 1/31/2017
- 02171400; FLEX Portable Diesel Engine Coolant Issues; 11/28/2016
- 02164624; FLEX Z-2005A Diesel Failed Crank Over Test; 10/23/2016
- 02152230; FLEX Diesel Pump Unable to Prime / Keep Prime; 8/25/2016
- 02203317; Revision to FLEX Documents
- 02188846; Potential NRC Green NCV For FSAR Update
- 02185834; FLEX/SFPI TI 2515-191 Inspection Pre-assessment

Calculations

- EC 288538/Evaluation No. 2015-008; FLEX Overturning Equipment Check; Rev. 1
- NEE-009-CALC-010; Evaluation and Modification of Steam Generator Storage Facility for Storage of FLEX Equipment; Rev. 1

Miscellaneous Documents

- Purchase Order 02336263; Supply Hose, Fittings, Couplings; 4/14/2015
- NRC 2015-0072; NextEra Energy Point Beach, LLC's Notification of Full Compliance with Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design Basis External Events and Submittal of Final Integrated Plan; 12/16/2015
- Nuclear Quality Assurance Surveillance Report 16-1004; FLEX Inspection Readiness Assessment; 1/5/17
- 4160 Volt Bus Photos; Train B; Rear View with Panels Removed
- EN-AA-205-1100-F10; Design Attribute Review Checklist; Rev. 0

- ETD 2; Offsite Agency Call List; Rev. 72
- Letter of Agreement Between Point Beach Nuclear Plant and Austin Straubel International Airport Green Bay; 1/30/2015
- Letter of Agreement Between Point Beach Nuclear Plant and Brandt Bus Service; 11/9/2016
- Letter of Agreement Between Point Beach Nuclear Plant and Kewaunee County Sherriff's Department; 11/3/2016
- Letter of Agreement Between Point Beach Nuclear Plant and Kewaunee County Emergency Management; 11/3/2016
- Letter of Agreement Between Point Beach Nuclear Plant and Manitowoc County Highway Department; 7/6/2016
- Letter of Agreement Between Point Beach Nuclear Plant and Manitowoc County Sherriff's Office; 11/9/2016
- Letter of Agreement Between Point Beach Nuclear Plant and Manitowoc County Emergency Management; 11/9/2016
- Letter of Agreement Between Point Beach Nuclear Plant and State of Wisconsin; 1/27/2016
- Letter of Agreement Between Point Beach Nuclear Plant and Town of Two Creeks; 1/24/2017
- Licensee Presentation; FLEX Mitigating Strategies SFP Level Instrumentation Communications & Staffing; Point Beach Nuclear Plants Units 1 & 2; May 8, 2017
- NEI 12-06; Diverse and Flexible Coping Strategies (FLEX) Implementation Guide; Rev. 1
- NEI 12-06; Diverse and Flexible Coping Strategies (FLEX) Implementation Guide; Rev. 2
- Nextera Energy Point Beach, LLC Response to 10 CFR 50.54(f) Request for Information Regarding Near-Term Task Force Recommendation 9.3, Emergency Preparedness; 10/31/2012
- Nextera Energy Proposal #070213-JG; Fukushima FLEX Steam Generator and Spent Fuel Pool Makeup Pumps; Xylem Dewatering Solutions, Inc.; 9/26/2013
- Nextera Energy Proposal #082013-JG; Fukushima FLEX 480 VAC Portable Generator; Tampa Armature Works, Inc.; 10/21/2013
- Point Beach Nuclear Plant Procedure Writer's Guide; Rev. 27
- Point Beach Nuclear Plant Purchase Order 02362969; Rev. 1
- Point Beach Nuclear Plant; NRC TI 2515-191 Inspection Question Responses for Questions 6, 13, 15, 15a, 16
- Response to Follow-up Technical Issues on 10 CFR 50.54(f) Request for Information Regarding Near-Term Task Force Recommendation 9.3, Emergency Preparedness; 2/22/2013
- Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, Emergency Preparedness-Phase 1 Staffing Assessment; 4/29/2013
- SPEC-E-059; FLEX 480 VAC Portable Generator; November 2013
- SPEC-M-205; Fukushima FLEX Steam Generator and Spent Fuel Pool Makeup Pumps; November 2013
- TAD1353GE; Volvo Penta Genset Engine; 5/12/2008
- Vendor Information Sheet; Quickcable; NEMA 2 Hole MagnaLugs; 5/10/2017
- VTM 1892; FLEX 480 VAC Portable Generator; 7/6/2016
- VTM 1903; Godwin High Pressure Pump Model 3316; 1/21/2016
- VTM 1904; Godwin Pump Model HL 130M With CAT C9 Engine; 12/29/2015
- EC 279037; NRC Order Fukushima FLEX SGSF Evaluation and Upgrade for FLEX Storage; Rev. 4
- SCR 2014-0001; NRC Order Fukushima FLEX SGSF Evaluation and Upgrade for FLEX Storage; 1/9/2014

Procedures

- PBF-2031; Aux Building Logs; Rev. 113
- AOP-10; Control Room Inaccessibility; Rev. 7
- AOP-18; Electrical System Malfunction; Rev. 7
- ECA-0.0 Unit 1; Loss of All AC Power; Rev. 68
- ECA-0.0 Unit 2; Loss of All AC Power; Rev. 69
- SEP 3.0 Unit 1; Loss of All AC Power While on Shutdown Cooling; Rev. 37
- SEP-1.1 Unit 1; Alternate Core Cooling; Rev. 15
- EPIP 1.3; Dose Assessment and Protective Action Recommendations; Rev. 50
- EPIP 1.3.1; Dose Assessment Using RMS-SS; Rev. 10
- EPIP 1.3.2; Dose Assessment Using Offsite Field Measurements; Rev. 8
- EPIP 7.3.1; Offsite Radiological Sampling and Surveys; Rev. 29
- EPIP 7.3.7; Estimating Radioiodine Air Concentrations and Thyroid Dose Rate; Rev. 10
- FSG-0; FLEX Information and Reference Guide; Rev. 1
- FSG-1 Unit 1; Long Term RCS Inventory Control; Rev. 1
- FSG 2; Alternate AFW Suction Source; Rev. 1
- FSG-3 Unit 1; Alternate Low Pressure Feedwater; Rev. 1
- FSG-4; ELAP DC Bus Load Shed/Management; Rev. 3
- FSG-5; Initial Assessment and FLEX Equipment Staging; Rev. 4
- FSG-5.1; FLEX Post Event Damage Assessment; Rev. 0
- FSG-5.2; FLEX Equipment Staging; Rev. 1
- FSG-5.3; FLEX Electrical Operations; Rev. 1
- FSG-5.4; FLEX Pump Operations; Rev. 2
- FSG-5.5; FLEX Equipment Refueling; Rev. 0
- FSG-5.6; FLEX Miscellaneous Equipment and Monitoring; Rev. 1
- FSG-5.7; FLEX NSRC Equipment Operation; Rev. 0
- FSG-6; Alternate CST Makeup; Rev. 1
- FSG-7; Loss of Vital Instrumentation or Control Power; Rev. 1
- FSG 8; Alternate RCS Boration; Rev. 2
- FSG-10 Unit 1; Passive RCS Injection Isolation; Rev. 1
- FSG-11; Alternate SFP Makeup and Cooling; Rev. 1
- FSG-12 Unit 1; Alternate Containment Cooling; Rev. 1
- FSG-14 Unit 1; Shutdown RCS Makeup; Rev. 1
- EPG 2.0; PBNP Site Safer Playbook; Rev. 3
- NP 7.7.36; Diverse and Flexible Coping Strategies (FLEX) Program; Rev. 2
- NP 10.3.6; Shutdown Safety Review and Safety Assessment; Rev. 51
- OM 3.42; Control of Wide Range Spent Fuel Pool Level Instrumentation and Credited FLEX Equipment; Rev. 5
- FLEX-AA-100; FLEX Equipment PM Basis Program; Rev. 4
- EN-AA-205-1100-F10; Design Attribute Review Checklist; Rev. 0
- EN-AA-110; Diverse and Flexible Coping Strategies (FLEX) Program; Rev. 5
- ICP 03.017; Calibration of Spent Fuel Pool Level Instrument Systems; Rev. 1
- Owner Acceptance Test of the Portable Diesel Charging Pump; 3/12/2014
- Point Beach Nuclear Plant IPEEE Two Creeks Wisconsin; 6/29/1995
- Point Beach Nuclear Plant Validation and Verification
- EPG 2.0; PBNP Site Safer Playbook; Rev. 3
- FSG Index; Rev. 12
- 0-SOP-FLEX-003; FLEX Portable Diesel Low Pressure Pump Operation Z-2003A & Z-2003B; Rev. 20

- 0-SOP-FLEX-004; FLEX Portable Diesel Steam Generator Injection Pump Operation Z-2004A & Z-2004B; Rev. 3

Training Documents

- PBN LOI TPD; PBNP Licensed Operator Initial Training; Rev. 23
- TR-AA-104; Attachment 2 – PBNP Licensed Operator Continuing Training Long Range Training Plan; 2015
- PBN EP TPD; PBNP Emergency Preparedness; Rev. 21
- PBN LOC 15B 008S; FLEX Training Scenario [Simulator Exercise Guide]; Rev. 0
- PBN LOC 15B 006L; FLEX Training – Part 1 [Classroom Lesson]; Rev. 1
- PBN LOC 15C 006L; FLEX Training – Part 2 [Classroom Lesson]; Rev. 1
- PBN LOC 15E 004L; FLEX Training – Part 3 [Classroom Lesson/Field Activity]; Rev. 1
- Generic Advance FLEX Training; Rev. 1
- Generic Basic FLEX Training; 2/23/2015

Work Orders

- WP 2015-016; Run Z-2005A to Obtain 2500 psig; 06/25/2015
- WP 2015-017; Run Z-2005B to Obtain 2500 psig; 06/25/2015
- WP 2015-018; Run Z-2005C to Obtain 2500 psig; 06/25/2015

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access Management System
CFR	*Code of Federal Regulations*
ELAP	Extended Loss of AC Power
EP	Emergency Preparedness
FLEX	Diverse and Flexible Coping Strategies
FSG	FLEX Support Guidelines
IMC	Inspection Manual Chapter
IR	Inspection Report
NRC	U.S. Nuclear Regulatory Commission
SFP	Spent Fuel Pool
TI	Temporary Instruction