# January 16, 2004

Mr. Alfred J. Cayia Site-Vice President Point Beach Nuclear Plant Nuclear Management Company, LLC 6610 Nuclear Road Two Rivers, WI 54241-9516

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

NRC EVALUATIONS OF CHANGES, EXPERIMENTS, OR TESTS AND

PERMANENT PLANT MODIFICATIONS INSPECTION

REPORT 05000266/2003010(DRS); 05000301/2003010(DRS)

Dear Mr. Cayia:

On December 19, 2003, the U.S. Nuclear Regulatory Commission (NRC) completed a routine baseline inspection at your Point Beach Nuclear Plant, Units 1 and 2. The enclosed report documents the inspection findings, which were discussed on December 22, 2003, during a telephone exit, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and to compliance with the Commission's rules and regulations and with the conditions of your license. Specifically, this inspection focused on the baseline biennial inspections for evaluations of changes, tests, or experiments (10 CFR 50.59) and permanent plant modifications. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on this inspection, the team identified a Severity Level IV violation of NRC requirements associated with the failure to perform an adequate safety evaluation review as required by 10 CFR 50.59. Specifically, your staff deleted Technical Requirements Manual (TRM) Surveillance Requirement TSR 3.5.1.3, which required that a quarterly flowrate test be performed for the charging pumps, but failed to provide a basis for the determination that this deletion was acceptable without a license amendment. Because the violation was non-willful and non-repetitive and because it has been entered into your corrective action program, the NRC is treating this issue as a Non-Cited Violation in accordance with Section VI.A.1 of the NRC's Enforcement Policy.

If you contest this Non-Cited Violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission - Region III, 801 Warrenville Road, Lisle, IL 60532-4351; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the Resident Inspector Office at the Point Beach Nuclear Plant.

A. Cayia -2-

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publically Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

Sincerely,

/RA/

Julio F. Lara, Chief Electrical Engineering Branch Division of Reactor Safety

Docket Nos. 50-266; 50-301 License Nos. DPR-24; DPR-27

Enclosure: Inspection Report 0500266/2003010(DRS);

0500301/2003010(DRS)

w/Attachment: Supplemental Information

cc w/encl: R. Kuester, President and Chief

Operating Officer, WEPCo

J. Cowan, Executive Vice President

Chief Nuclear Officer Nuclear Asset Manager Manager, Regulatory Affairs

J. Rogoff, Esquire, Vice President, Counsel & Secretary

K. Duveneck, Town Chairman

Town of Two Creeks

Chairperson

Public Service Commission of Wisconsin

J. Kitsembel, Electric Division

Public Service Commission of Wisconsin

State Liaison Officer

A. Cayia -2-

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# U.S. NUCLEAR REGULATORY COMMISSION REGION III

Docket Nos: 50-266; 50-301 License Nos: DPR-24; DPR-27

Report No: 05000266/2003010(DRS); 05000301/2003010(DRS)

Licensee: Nuclear Management Company, LLC

Facility: Point Beach Nuclear Plant, Units 1 and 2

Location: 6610 Nuclear Road

Two Rivers, WI 54241

Dates: December 15 through 22, 2003

Inspectors: R. Daley, Reactor Engineer, Team Lead

R. Winter, Reactor Engineer N. Valos, Operations Engineer

Observer: A. Klett, NRC Intern

Approved by: Julio F. Lara, Chief

Electrical Engineering Branch Division of Reactor Safety

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#### SUMMARY OF FINDINGS

IR 05000266/2003010(DRS), 05000301/2003-010(DRS); 12/15/2003 - 12/19/2003; Point Beach Nuclear Plant, Units 1 & 2; Routine Baseline Inspection Report.

This report covers a five day period of announced baseline inspection on evaluations of changes, tests, or experiments and permanent plant modifications. The inspection was conducted by Region III inspectors. One Severity Level IV Non-Cited Violation was identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be "Green" or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

# A. <u>Inspector-Identified and Self-Revealed Findings</u>

# **Cornerstone: Initiating Events**

• NCV. The inspectors identified a Severity Level IV Non-Cited Violation associated with the failure to perform an adequate safety evaluation review as required by 10 CFR 50.59 for changes made to the facility as described in the Updated Safety Analysis Report (USAR). Specifically, the licensee deleted Technical Requirements Manual (TRM) Surveillance Requirement TSR 3.5.1.3, which required that a quarterly flowrate test be performed for the charging pumps, but failed to provide a basis for the determination that this deletion was acceptable without a license amendment. The safety evaluation failed to address the purpose of the flowrate test which was to ensure that one changing pump could sufficiently compensate for the addition of positive reactivity from the decay of xenon after a reactor trip.

Because the Significance Determination Process (SDP) is not designed to assess the significance of violations that potentially impact or impede the regulatory process, this issue was dispositioned using the traditional enforcement process in accordance with Section IV of the NRC Enforcement Policy. However, the results of the violation, that is, the failure to evaluate the deletion of TSR 3.5.1.3 from the TRM, were assessed using the SDP.

The team considered this issue of more than minor significance, because if left uncorrected, the finding could become a more significant safety concern. The inspectors determined that the issue was of very low safety significance, because the licensee was still measuring quarterly charging pump flow rates for the testing of the pumps' discharge check valves. The resultant flow rates bounded the requirements of the deleted TRM Surveillance Requirement. Therefore, the results of the violation were determined to be of very low safety significance and the violation of 10 CFR 50.59 was classified as a Severity Level IV violation.

Because this non-willful violation was non-repetitive, and was captured in the licensee's corrective action program, this issue is being treated as a Non-Cited Violation, consistent with the NRC Enforcement Policy (Section 1R02).

**Cornerstone: Mitigating Systems** 

No findings of significance were identified.

**Cornerstone: Barrier Integrity** 

No findings of significance were identified.

# B. <u>Licensee-Identified Violations</u>

No findings of significance were identified.

## **REPORT DETAILS**

# **Summary of Plant Status**

Units 1 and 2 operated at or near full power throughout the inspection period.

#### 1. REACTOR SAFETY

**Cornerstone: Initiating Events, Mitigating Systems, and Barrier Integrity** 

1R02 Evaluations of Changes, Tests, or Experiments (71111.02)

.1 Review of 50.59 Evaluations and Screenings

# a. <u>Inspection Scope</u>

The inspectors reviewed eight evaluations performed pursuant to 10 CFR 50.59. The evaluations related to permanent plant modifications, setpoint changes, procedure changes, conditions adverse to quality, and changes to the updated final safety analysis report. The inspectors confirmed that the evaluations were thorough and that prior NRC approval was obtained as appropriate. The inspectors also reviewed 15 screenings where the licensee had determined that a 10 CFR 50.59 evaluation was not necessary. In regard to the changes reviewed where no 10 CFR 50.59 evaluation was performed, the inspectors verified that the changes did not meet the threshold to require a 10 CFR 50.59 evaluation. These evaluations and screenings were chosen based on risk significance of samples from the different cornerstones.

#### b. Findings

<u>Introduction</u>: The inspectors identified that the licensee failed to perform an adequate safety evaluation in accordance with 10 CFR 50.59 before making changes to the Updated Safety Analysis Report (USAR). The issue was considered to be of very low safety significance and was dispositioned as a Severity Level IV NCV.

<u>Description</u>: On October 16, 2001, the licensee completed Safety Evaluation (SE) 2001-0057. This safety evaluation deleted Technical Requirements Manual (TRM) Surveillance Requirement TSR 3.5.1.3, which required that the licensee verify, every 92 days, that the "charging pumps develop required flow rate, as specified by the Inservice Testing [IST] Program." Because the TRM is part of the plant USAR, the performance of a safety evaluation was required.

In the safety evaluation, the licensee justified the deletion of the requirement by stating, "Based on the fact that the PBNP Charging Pumps are not credited with an active safety function that would require IST Program testing, the Charging Pump IST surveillance requirement need not be carried over to the TRM." The reasoning for the change was entirely based upon the charging pumps having no safety function. While this appeared to be adequate justification to delete the IST requirement for the pumps, it did not justify

the deletion of the TRM Surveillance Requirement. As stated in the PBNP Bases for TRM TLCO 3.5.1, the function of the charging pumps in support of the Chemical and Volume Control System (CVCS) is described as follows, "The amount of boric acid injection must be sufficient to compensate for the addition of positive reactivity from the decay of xenon after a reactor trip from full power in order to maintain the required shutdown margin. This can be accomplished through the operation of one charging pump taking suction from the RWST." TSR 3.5.1.3 measured the flow rate to ensure that the charging pumps could support this function. When TSR 3.5.1.3 was deleted, this function was not evaluated in the safety evaluation. Consequently, the discussion, as presented in SE 2001-0057, only evaluated the removal of the IST requirements for the charging pumps, but did not evaluate the effects of removing the TRM Surveillance Requirement.

The inspectors determined that this was a violation of 10 CFR 50.59 in that the licensee did not provide bases that the deletion of TSR 3.5.1.3 was acceptable without a license amendment. However, even though TSR 3.5.1.3 had been deleted, the licensee had still been performing a quarterly flow rate test of the charging pumps for the purpose of testing the charging pump discharge check valves. The inspectors determined that the flow rate measured in this quarterly test was sufficient to meet the requirements in TSR 3.5.1.3.

<u>Analysis</u>: Because violations of 10 CFR 50.59 are considered to be violations that potentially impede or impact the regulatory process, they are dispositioned using the traditional enforcement process instead of the SDP. In this case, the licensee's failure to perform an adequate safety evaluation in accordance with 10 CFR 50.59 resulted in a TRM Surveillance Requirement, TSR 3.5.1.3, being removed inappropriately.

This finding is more than minor because if left uncorrected, the finding would become a more significant safety concern. However, based upon the inspector's review, it was determined that the licensee's failure to provide the required basis for the 50.59 safety evaluation was an issue of very low safety significance. This was based upon the inspector determining that the measured quarterly charging pump flow rate for the discharge check valves test was sufficient to meet the requirements of the deleted TRM Surveillance Requirement.

<u>Enforcement</u>: Title 10 CFR 50.59(d)(1) states, in part, that the licensee shall maintain records of changes in the facility, of changes in procedures, and of tests and experiments. These records must include a written evaluation which provides the bases for the determination that the change, test, or experiment does not require a license amendment.

Contrary to the above, in their safety evaluation, SE 2001-0057, dated October 16, 2001, the licensee failed to provide a basis for the determination that the deletion of the TRM Surveillance Requirement, part of the plant's USAR, was acceptable without a license amendment. The results of this violation were determined to be of very low safety significance; therefore, this violation of the requirements in 10 CFR 50.59 was classified as a Severity Level IV Violation. However, because this non-willful violation was

non-repetitive, and was captured in the licensee's corrective action program (CAP052416), it is considered a Non-Cited Violation (NCV05000266, 05000301/200310-01(DRS)) consistent with VI.A.1 of the NRC Enforcement Policy.

# 1R17 Permanent Plant Modifications (71111.17)

#### .1 Review of Recent Modifications

# a. <u>Inspection Scope</u>

The inspectors reviewed eight permanent plant modifications. The modifications were chosen based upon their affecting systems that had high probabilistic risk analysis (PRA) significance in the licensee's Individual Plant Evaluation (IPE) or high maintenance rule safety significance. The inspectors reviewed the modifications to verify that the completed design changes were in accordance with the specified design requirements and the licensing bases and to confirm that the changes did not affect any system's safety function. Design and post-modification testing aspects were verified to ensure the functionality of the modification, its associated system, and any support systems. The inspectors also verified that the modifications performed did not place the plant in an increased risk configuration.

## b. Findings

No findings of significance were identified.

# 4. OTHER ACTIVITIES (OA)

4OA2 <u>Identification and Resolution of Problems</u> (71152)

## .1 Routine Review of Condition Reports

## a. <u>Inspection Scope</u>

The inspectors reviewed a selected sample of condition reports associated with Point Beach Nuclear Plant's permanent plant modifications and concerning 10 CFR 50.59 evaluations and screenings. The inspectors reviewed these issues to verify an appropriate threshold for identifying issues and to evaluate the effectiveness of corrective actions. In addition, condition reports written on issues identified during the inspection were reviewed to verify adequate problem identification and incorporation of the problem into the corrective action system. The specific corrective action documents that were sampled and reviewed by the team are listed in the attachment to this report.

#### b. Findings

No findings of significance were identified.

# 4OA6 Meetings

# .1 Exit Meeting

The inspectors presented the inspection results to Mr. Cayia and other members of licensee management by a telephone exit on December 22, 2003. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

# .2 <u>Interim Exit Meetings</u>

No interim exits were conducted.

ATTACHMENT: SUPPLEMENTAL INFORMATION

#### SUPPLEMENTAL INFORMATION

## **KEY POINTS OF CONTACT**

# <u>Licensee</u>

- D. Black, 50.59 Process Owner
- J. Connolly, Regulatory Affairs Manager
- F. Flentje, Principal Regulatory Affairs Analyst
- K. Holt, Configuration Management Supervisor
- C. Krause, Senior Regulatory Affairs Engineer
- J. Marean, Mechanical Design Supervisor
- T. Petrowsky, Design Engineering Manager
- M. Rosseau, Electrical/I&C Design Supervisor
- J. Schweitzer, Engineering Director
- R. Scott, Licensing Supervisor

# **Nuclear Regulatory Commission**

- P. Krohn, Point Beach Senior Resident Inspector
- J. Lara, Region III Electrical Engineering Branch Chief
- M. Morris, Point Beach Resident Inspector
- T. Vegel, Chief, Reactor Projects Branch 7

# LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

## **Opened**

05000266, 05000301/2003010-01 NCV Failure to Perform an Adequate Safety Evaluation

for Changes to the Plant as Described in the USAR

(Section 1R02)

## Closed

05000266, 05000301/2003010-01 NCV Failure to Perform an Adequate Safety Evaluation

for Changes to the Plant as Described in the USAR

(Section 1R02)

## Discussed

None.

#### LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of 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.

## CORRECTIVE ACTION DOCUMENTS GENERATED DURING THE INSPECTION

CAP052408; AOP-1B has Redundant Criteria for Transitioning to Step 11; dated December 17, 2003

CAP052416; Removal of Requirement from TRM 3.5.1 (CVCS) Questioned; dated December 17, 2003

CAP052440; Charging Pump Maximum Flow Rate May Not Meet Appendix R Assumptions; dated December 18, 2003

CAP052452; FSAR Not Updated to Reflect Revised LTOP Pressure Setpoint; dated December 18, 2003

CAP052454; Tech Spec Bases for LTOP Cites Incorrect Reference; dated December 18, 2003

CAP052483; Conduct an Extent of Condition Review of Appendix R Safe Shutdown Calcs; dated December 19, 2003

## CORRECTIVE ACTION DOCUMENTS REVIEWED DURING INSPECTION

CAP001916; Incorrect Answer to Tech Spec Change Question in 50.59 Evaluation; dated January 18, 2002

CAP001927; G-01/G-02 Room Fans May Exceed the Fan Motor Starting Duty; dated January 18, 2002

CAP005363; Service Water Zurn Strainer Inoperable; dated June 26, 2001

CAP013360; Rope and Wood on Service Water Piping; dated January 12, 2001

CAP013508; Charging Pump Testing; dated February 15, 2001

CAP014007; Switch Changed with no Mod Paperwork; dated May 15, 2001

CAP030040; Power Supply to AFW pump recirc valves not Safety Related; dated November 7, 2002

CAP030209; Loss of 125VDC Bus D-01 Could Make Three AFW Pumps Inoperable; dated November 21, 2002

CAP030680; Work Activities for Auto Bus Transfer Concerns; dated January 11, 2003

CAP030694; Calculation N-91-1007 Assumes a 60 F AFW Temperature; dated January 13, 2003

CAP030928; Potential Non-Conservative Technical Specification; dated January 30, 2003

CAP030942; Error Found in Calculation That is Part of MR IC-325/326/327; dated January 31, 2003

CAP031136; Potential Inadequacies with Implementation of 10 CFR 50.59/72.48 (New Rule); dated February 13, 2003

CAP031315; Discrepancies in Minimum App. R Requirements for G-05 Fuel Oil Level; dated February 25, 2003

CAP031502; Incorrect Setpoint Approved and Installed for G05 Fuel Tank Low Level Alarm; dated April 7, 2003

CAP032004; Method of Maintaining SW Flow to G01/G02 EDGs May Result in Inoperability; dated April 4, 2003

CAP032548; Main Service Water Zurn Strainers Have No Safety Function to Strain Water; dated April 29, 2003

CAP033048; Vent Valves Need Tubing Installed; dated May 22, 2003

CAP034638; Removal of All but 4 Bolts from SG Primary Manways Prior to RCS Breach; dated August 7, 2003

CAP050367; 50.59 Screening for CC Relief Valve Set point Change Inadequately Documented; dated September 23, 2003

CAP052329; MR 01-021, "Replace 1RC-427 MOV Actuator Motor" Electrical Review not Performed; dated December 15, 2003

# **MODIFICATIONS**

MR 00-003; Reroute Reactor Protection Cable ZB1NB105A Out of Riser R85 to Eliminate Separations Violation; dated January 2, 2000

MR 00-071; Elimination of Nuisance Low Starting Air Pressure Alarms During EDG Start - G02; dated August 15, 2001

MR 01-064; Replace P-32 Motor; dated May 23, 2001

MR 01-128\*C; Replace MCC 1B-42 Breaker Buckets to Resolve Bolted Fault Issues; dated June 24, 2002

MR 02-017; Top Hat and Stay Bushing Modification for the Service Water Motors P-32A-M Thru P-32F-M; dated June 5, 2002

MR 03-006; Repower AFW Pump Recirculation Valve DPIS Devices from Safety Related Power Supplies; dated August 7, 2003

MR 03-010; Modification of Supports on Safety Injection Piping Near 2FIT-00930; dated April 2, 2003

MR 98-115; Replace Non-Seismic Qualified Relays on G02; dated May 9, 2003

#### 10 CFR 50.59 EVALUATIONS

SE 2002-005; Permanent Procedure Changes to Address Potential Simultaneous Failure of All AFW Pumps; dated April 27, 2002

SE 2002-010; Changes to Bases Documents for TS 3.4.12; dated December 2, 2002

SE 2003-002; Method of Evaluation Change Eliminating Arbitrary Intermediate Pipe Rupture Analysis for HELBs Outside of Containment; dated February 27, 2003

SE 2001-0003; Revision to Chapter 6.2.2 of the FSAR; dated January 17, 2001

SE 2001-0014; MR 98-024\*J, Unit 1 Containment Fan Cooler and Fan Motor Cooler Replacement; dated March 14, 2001

SE 2001-0054; PBTP 107 "Emergency Diesel Generator G-04 Test"; dated October 8, 2001

SE 2001-0057; TRM 3.5.1/TSR 3.5.1.3 and TSR 3.5.1.3 Bases Revision (Draft Rev. C); dated October 16, 2001

SE 2001-0059; Operation of the Auxiliary Feedwater Pumps Without Cooling Water; dated November 13, 2001

#### 10 CFR 50.59 SCREENINGS

SCR 2001-0383; IT-250 Stroke Time Change 1CC-719; dated April 26, 2001

SCR 2001-0509; RCP Seal Leakage Operating Limits and Action Responses; dated June 13, 2001

SCR 2001-0548; Peak Containment Temperature Apparent Discrepancy; dated July 5, 2001

SCR 2001-0548-01; Peak Containment Temperature Apparent Discrepancy; dated July 10, 2001

SCR 2001-0589-02; MR 01-064, "Replace Motor for Service Water Pump P-32D"; dated February 1, 2002

SCR 2002-0067; Revision to Bases Document B3.6.2, Containment Air Locks; dated July 26, 2002

SCR 2002-0090; Revision of TS-EP-001 To Incorporate Revised Instrument Bus Voltage Limits; dated March 8, 2002

SCR 2002-0123; MR 00-003, "Reroute Reactor Protection Cables to Eliminate Train Separation Violations"; dated March 29, 2002

SCR 2002-0170; Addition of Weight and Stay Bushing to the Service Water Motors (P-32A-M through P-32F-M); dated April 26, 2002

SCR 2002-0186; PBTP 114 - Contact Closure Verification for G-02 Fast Start for Unit 2 SI or 2A05 Undervoltage; dated April 30, 2002

SCR 2002-0218; MR 02-007 Fish Deterrent System; May 23, 2002

SCR 2002-0245; MR 01-113, Hard Piping the Service Air Supply to the Exciter; dated June 20, 2002

SCR 2002-0348; Changes to TRM 3.7.7; dated September 3, 2002

SCR 2002-0348 R1; Changes to TRM 3.7.7; dated September 5, 2002

SCR 2002-0256-01; Upgrade Screen Start System, Forebay Level, and Add Pumpbay Level Instrumentation; dated December 26, 2002

## **PROCEDURES**

AOP-1B Unit 1; Reactor Coolant Pump Malfunction; Revision 17

AOP-10A; Safe Shutdown - Local Control; Revision 36

AOP-10B; Safe to Cold Shutdown in Local Control; Revision 6

IT 21; Charging Pumps and Check Valve Test (Quarterly) Unit 1; Revision 12

NP 5.1.8; 10 CFR 50.59/72.48 Applicability, Screening, and Evaluation (New Rule); Revision 4

NP 7.2.1; Plant Modifications; Revision 15

NP 7.2.15; Fleet Modification Process; Revision 0

NP 7.2.25; Modification Turnover and Closeout; Revision 0

5

OI 70; Service Water System Operation; Revision 48

#### **MISCELLANEOUS DOCUMENTS**

CALC 2002-0003; Service Water Design Basis; Revision 0

CALC 2003-0062; AFW Pump NPSH Calculation; Revision 0

CALC 97-0215; Water Volume Swept by all Four AFW Pumps Following a Seismic/Tornado Event Affecting Both Units; Revision 3

CALC WE0005-02; PBNP Appendix R Charging Flow Required for Design Cooldown Rate; dated July 1, 1997

CTS Table 15.4.1-2; Minimum Frequencies for Equipment and Sampling Tests; Unit 1-Amendment No. 171, Unit 2 - Amendment No. 175

CTS Table 15.4.1-2; Minimum Frequencies for Equipment and Sampling Tests; Unit 1-Amendment No. 173, Unit 2 - Amendment No. 177

Design Change Request DCR030197; Main Service Water Zurn Strainers Have No Safety Function to Strain Water; dated May 30, 2003

FSAR Table 4.1-1; Reactor Coolant System Design Parameters and Pressure Settings; dated June 2003

Operability Recommendation OPR31; SW Main Zurn Strainers SW-2911-BS & SW-2912-BS; Revision 6

Technical Requirements Manual (TRM) 2.2; Pressure Temperature Limits Report; Unit 1 and Unit 2; Revision 1

TRM 3.5.1; Chemical and Volume Control System; Revision 0

TRM 3.5.1; Chemical and Volume Control System; Draft Revision C

TRM Bases TB 3.5.1; Chemical and Volume Control System; Draft Revision C

Technical Specification 3.4.12; Low Temperature Overpressure Protection (LTOP) System; Unit 1-Amendment No. 201, Unit 2-Amendment No. 20

Technical Specification 3.6.2; Containment Air Locks; Unit 1-Amendment No. 201, Unit 2-Amendment No. 206

Technical Specification Bases B 3.4.12; Low Temperature Overpressure Protection (LTOP) System; dated March 3, 2003

Technical Specification Bases B 3.6.2; Containment Air Locks; Unit 1-Amendment No. 201, Unit 2-Amendment No. 206

Technical Specification Bases B 3.6.5; Containment Air Temperature; Unit 1-Amendment No. 206, Unit 2-Amendment No. 211

Temp Change 2003-0529; FOP 1.2 - Potential Fire Affected Safe Shutdown Components

#### LIST OF ACRONYMS USED

ADAMS Agency-Wide Document Access and Management System

CFR Code of Federal Regulations

CVCS Chemical and Volume Control System

DPR Demonstration Power Reactor
DRS Division of Reactor Safety
IMC Inspection Manual Chapter
IPE Individual Plant Evaluation

IR Inspection Report IST In-Service Testing

LLC Limited Liability Company NCV Non-Cited Violation

NMC Nuclear Management Company

NRC United States Nuclear Regulatory Commission

PBNP Point Beach Nuclear Plant
PRA Probabilistic Risk Assessment
RWST Refueling Water Storage Tank
SDP Significance Determination Process

SE Safety Evaluation

TLCO Technical Requirements Manual Limiting Consideration for Operability

TRM Technical Requirements Manual TSR TRM Surveillance Requirement

UFSAR Updated Final Safety Analysis Report

wpd WordPerfect Document

www World Wide Web