



Nuclear Management Company, LLC  
Point Beach Nuclear Plant  
6610 Nuclear Road  
Two Rivers, WI 54241

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NPL 2000-0536

December 13, 2000

10 CFR 50.55(a)

Document Control Desk  
U.S. NUCLEAR REGULATORY COMMISSION  
Mail Station P1-137  
Washington, DC 20555

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301  
ASME SECTION XI PRESSURE TEST PROGRAM  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This letter notifies the Commission of Point Beach Nuclear Plant's (PBNPs) intent to apply the requirements set forth in Section XI of the ASME Boiler & Pressure Vessel Code, 1995 Edition through 1996 Addenda, Articles IWA-5000 and IWB-5000 in lieu of those specified in the ASME Section XI Code, 1986 Edition, as modified by the alternative rules provided in Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2 and 3 Systems." In support of adopting the later edition/addenda of ASME XI, 10 CFR 50.55a(b) allows the use of the 1995 Edition through 1996 Addenda, as providing an acceptable level of quality and safety.

The Section XI, 1995 Edition through 1996 Addenda Code requirements shall be applied in their entirety to the following reactor coolant system (RCS) Class 1 piping and components:

- 10", 2" and ¾" piping between valves SI-867A and SI-842A up to and including branch connection piping and valves SI-845A, SI-845E and SI-839B
- 10", 2" and ¾" piping between valves SI-867B, RH-720 and SI-842B up to and including branch connection piping and valves SI-845B, SI-845F and SI-839D
- 6" and 2" piping between valves SI-853C and SI-853A up to and including SI-845C
- 6" and 2" piping between valves SI-853D and SI-853B up to and including SI-845D.

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The identified portions of piping and components are insulated piping between the first and second isolation valves of the Class 1 reactor coolant system. Complying with the rules of ASME XI 1986 Edition and N-498-1 would require pressurizing the piping between these check valves for a period of four hours prior to performing a VT-2 visual examination. The only practical means available for pressurizing these sections of Class 1 piping and components to nominal operating pressure is by utilizing an outside pressure source and applying pressure via a check valve leak detection system. It would be necessary to perform this testing activity in conjunction with the reactor coolant system leakage test to achieve the nominal operating pressure of 2235 psig. The adoption of the requirements set forth in Section XI of the ASME Boiler & Pressure Vessel Code 1995 Edition through the 1996 Addenda would minimize the duration of the testing activities by eliminating the 4-hour hold time after attaining test pressure and temperature thereby reducing the impact on plant operations.

These later Code requirements will also be applied in their entirety to the Class 2 main steam piping and components supplying the motive force for auxiliary feedwater pump turbine operation. This includes the 3" and 2" piping between supply valves MS-2019 and MS-2020, up to and including the auxiliary feedwater pump turbine trip/throttle valve MS-2082. This portion of piping and components is insulated. Complying with the rules of ASME XI 1986 Edition and N-498-1 would require pressurizing the piping between the motor-operated steam supply stop check valves and the trip/throttle valve for a period of four hours prior to performing a VT-2 Visual examination. The logical means of pressurizing this section of piping and components to nominal operating pressure is during periodic testing of the turbine-driven auxiliary feedwater pump or by allowing main steam header pressure to communicate with the supply piping while simultaneously having the trip/throttle valve in the shut position.

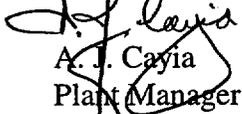
Periodic testing of the turbine-driven auxiliary feedwater pumps requires a reactor power reduction to 2% below limiting reactor power. The reason for the power reduction is that the reactor thermal output calculation becomes inaccurate, as measured feed flow is less than total feed flow. Performing a pump runtime in excess of four hours, solely in the recirculation mode, is not practical due to the potential of damaging the pump from overheating. Running the steam-driven auxiliary feedwater pumps for testing adds to the LCO duration and unavailability time of the system for maintenance rule purposes. Exposing the portion of piping to pressure from either main steam header, with the pump secured, is not practical because it requires the defeating of various interlocks. Adoption of the requirements of ASME Section XI, 1995 Edition through the 1996 Addenda, will provide adequate assurance of leak-tight integrity, will not place the system in a condition adverse to quality and safety, and will reduce unavailability time for the auxiliary feedwater system.

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The identified requirements shall be applied in their entirety to the portions specified and shall apply to both PBNP units for the remainder for the Third 10-year interval of each unit; August 31, 2002 for Unit 1, and November 30, 2002 for Unit 2, respectively. The use of the more recent approved Code requirements shall be documented in the Third Interval Pressure Test Program.

If you have questions or require additional information regarding this matter, please contact us.

Sincerely,

  
A. J. Cayia  
Plant Manager

cc: NRC Resident Inspector  
NRC Regional Administrator  
NRC Project Manager  
PSCW

CTP/JSK