



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

NPL 2000-0555

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10 CFR 50.55a

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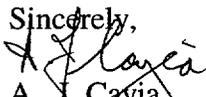
Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301  
ASME SECTION XI RELIEF REQUESTS  
UNIT 1 RR-1-23 AND UNIT 2 RR-2-29  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Licensee's are required to update their Inservice Inspection (ISI) Programs every 10 years to the latest Code referenced in 10 CFR 50.55a. The updates for Point Beach Nuclear Plant (PBNP) units 1 and 2 will become effective mid-2002.

PBNP is requesting relief for the next ISI Program update. Pursuant to 10 CFR 50.55a(a)(3)(I), PBNP requests an alternative to the Section XI Code IWA-2430(b) requirement, and the 10 CFR 50.55a(g)(4)(ii) requirement for for the determination of the fourth and successive inspection intervals. Relief Requests RR-1-23 and RR-2-29, would have the same interval start dates for both units. The proposed start date for the fourth interval is July 1, 2002. Subsequent Inservice Inspection intervals will start every 10 years after this date. Altering the dates for the start of the fourth inservice inspection interval will align the intervals for both units to be the same. This will allow updating of both units to the latest ASME Code requirements, including applicable procedures, at the same time.

Please contact us if you have questions regarding these relief requests.

Sincerely,  
  
A. J. Cayia  
Plant Manger

FAF/jlk  
Attachments

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

A047

ATTACHMENT 1  
UNIT 1 RELIEF REQUEST RR-1-23  
UNIT 2 RELIEF REQUEST RR-2-29

Background

Point Beach Nuclear Plant (PBNP) Unit 1 and Unit 2 commercial service dates are December 21, 1970, and October 1, 1972 respectively. These dates establish the inspection intervals for inservice inspection (ISI) and are 650 days apart. PBNP desires to align the interval dates so both units are on the same schedule and working to the same rules.

PBNP previously informed the Commission of the need to alter the existing Interval dates, via correspondence dated August 27, 1999, "ASME Section XI ISI Long Term Plan Extension." This relief request supersedes that letter and requests a modification of the fourth and subsequent interval dates. This is to align the inspection interval start dates so applicable Section XI rules for both units are the same and implemented at the same time.

Plants for Which Relief is Requested:

Point Beach Nuclear Plant Unit 1, Docket 50-266  
Commercial Service Date: December 21, 1970

Point Beach Nuclear Plant Unit 2, Docket 50-301  
Commercial Service Date: October 1, 1972

Code of Federal Regulations and ASME Section XI Requirements:

10 CFR 50.55a(g)(4)(ii) – Inservice examination of components and system pressure tests conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section 12 months prior to the start of the 120-month inspection interval, subject to the limitations and modifications listed in paragraph (b) of this section.

ASME Section XI, IWA-2430(b) Inspection Intervals- The inspection interval shall be determined by calendar years following placement of the plant into commercial service.

ASME Section XI, IWA-2432- Successive Inspection Intervals – 10 years following the previous inspection interval.

ASME Section XI:

Table IWB-2412-1, Inspection Program B  
Table IWC-2412-1, Inspection Program B  
Table IWD-2412-1, Inspection Program B

Table IWF-2410-1, Inspection Program B

Relief Requested:

Relief is requested from updating the ISI program on the timetable required by ASME Section XI and the Code of Federal Regulations. PBNP requests the start date for the fourth interval ISI programs be the same for both units. The proposed date for the start of the fourth inspection interval for both units is July 1, 2002.

The relief will apply to the ISI and Pressure Test Programs.

Basis for Relief:

PBNP Units 1 and 2 began commercial operation on December 21, 1970, and October 1, 1972, respectively. These dates are almost two years apart (650 days), and since the ISI Programs are linked to the commercial operating dates, the Editions of ASME Section XI effective during the 650 days between the unit updates will be different. When the next update becomes effective, PBNP Unit 1 will be using the latest ASME Section XI Edition referenced in 10 CFR 50.55a, while PBNP Unit 2 will still be using the 1986 Edition. Updating to a new Code edition requires a significant amount of work on the part of many personnel to ensure compliance, and requires the updating of numerous documents and procedures.

Having both units on the same edition of ASME Section XI and schedule has distinct advantages. There are fewer procedures to maintain, and procedures will be meeting the requirements of one edition of the Code, instead of two different editions. The ISI Programs can be written as one document covering both units. This reduces the chance of applying the wrong ISI requirements. One set of procedures and documents reduces the administrative burden of complying with ISI requirements without a reduction in the quality of the ISI program.

A review of previous outages was performed. PBNP Unit 1 had two outages lasting six continuous months or more. The first extended outage occurred during the steam generator replacement project in 1983-84 and was in the Second Interval. This outage lasted 6 months and 8 days (189 days total). The second extended outage for PBNP Unit 1 occurred in 1997 (Third Interval), and lasted for 10 months and 18 days (292 days total). This outage upgraded the steam turbines and corrected administrative processes. PBNP elected to take advantage of the IWA-2430(e) allowance of the 1986 Edition of Section XI to extend the interval. By using the 292-day interval extension allowed by IWA-2430(e) from the 1997 outage, the interval end date moves from December 20, 2000, to October 8, 2001. If the extensions from both intervals had been used, the interval end date would have been April 15, 2002.

On PBNP Unit 2, an outage of 11 months and 11 days (315 days) occurred during the 1996-97 steam generator replacement. PBNP elected to not use the IWA-2430(e) interval extension allowed by the 1986 ASME Section XI Code. Had it been used, this would have placed additional time between the interval end dates for the units.

The required Third Interval examinations for PBNP Unit 1 will be completed by the end of June 2001. The PBNP Unit 1 outage after this date, which will be the first for the Fourth Interval begins is scheduled for September 2002; several months after the fourth interval begins.. PBNP proposes revising the Third Interval end date for PBNP Unit 1 to June 30, 2002. This revision will not affect the number of examinations completed for the Third Interval, or the Fourth Interval ISI plans and schedules.

The Third Interval for Unit 2 is scheduled to end on September 30, 2002. Required examinations for the Third Interval will be completed several months ahead of this date. The proposed alternative will shorten the Third Interval by three months, to June 30, 2002. Again, this will not affect Third or Fourth Interval examination schedules. Attachment 2 shows the ISI ten-year interval relationships.

Altering the start of the intervals for both units will allow them to begin on the same date, which is proposed to be July 1, 2002. Non-Destructive Examination (NDE) procedures will be updated to the applicable Edition of Section XI at that time.

With the proposed alternative schedule, the required Third Interval examinations will be completed as scheduled for both PBNP units. There will be no reduction in the number of examinations for either unit as a result of the date change.

PBNP plans to implement a Risk Informed Inservice Inspection (RI-ISI) Program for piping. The RI-ISI Program project will begin on January 1, 2001, and is expected to be completed sometime during the fourth quarter of 2001. Moving the interval start date enables PBNP to complete the RI-ISI project in time to prepare the program submittals to include the RI-ISI relief requests.

Alternate Requirement:

PBNP will start the fourth inspection intervals for both PBNP Units 1 and 2 on July 1, 2002.

NDE procedures will be updated to the requirements of the selected edition of ASME Section XI, effective July 1, 2002. Examinations performed after this date will be performed to the procedures complying with the selected edition of ASME Section XI

Administrative procedures and documents will be updated to the requirements of the selected Edition of Section XI on July 1, 2002. All requirements of the new ISI Program will be implemented at that time.

Justification of Relief:

Altering the fourth interval so both PBNP Unit 1 and Unit 2 begin on the same date reduces the administrative costs and burden of complying with two different editions of Section XI. The possibility of working to the wrong procedures or documents (both NDE and administrative) is reduced as they would all be to the same edition of Section XI.

With the RI-ISI project, PBNP will need additional time for Unit 1 to gather and analyze information. This is anticipated to require six to nine months for completion, with additional time to prepare the RI-ISI program and submittals. This will result in having all work completed by the end of 2001. This schedule allows at least six months for review by the external regulatory agencies before the Fourth Interval begins.

The proposed action does not result in a reduction of examinations and provides an acceptable level of safety and quality.

Implementation Schedule:

The ISI Programs for PBNP Units 1 and 2 will be updated and become effective on July 1, 2002. The new interval schedule will remain in effect for the Fourth and subsequent ISI Intervals.

Attachment 2

Outage Dates and Schedule

ATTACHMENT 2  
POINT BEACH NUCLEAR PLANT OUTAGE DATES

UNIT 1			
Outage	Start Date	End Date	Length (days)
	12/20/1970	Commercial Service Date	
U1R01	09/30/1972	03/03/1973	154
U1R02	04/06/1974	06/07/1974	62
U1R03	11/16/1975	01/08/1976	53
U1R04	10/02/1976	11/24/1976	53
U1R05	10/04/1977	11/03/1977	30
U1R06	09/20/1978	10/15/1978	25
U1R07	10/04/1979	12/01/1979	58
U1R08	11/28/1980	12/23/1980	25
U1R09	10/09/1981	12/09/1981	61
U1R10	10/22/1982	12/07/1982	46
U1R11(1)	10/01/1983	04/07/1984	189
U1R12	04/05/1985	06/19/1985	75
U1R13	04/11/1986	05/20/1986	39
U1R14	04/04/1987	06/01/1987	58
U1R15	04/08/1988	05/20/1988	39
U1R16	04/02/1989	05/16/1989	44
U1R17	03/31/1990	05/16/1990	46
U1R18	04/06/1991	05/16/1991	40
U1R19	04/11/1992	06/05/1992	55
U1R20	03/27/1993	05/06/1993	40
U1R21	04/02/1994	04/30/1994	28
U1R22	03/11/1995	04/17/1995	37
U1R23	03/30/1996	04/24/1996	25
(2)	02/18/1997	12/07/1997	292
U1R24	02/14/1998	06/30/1998	136
U1R25	10/15/1999	12/10/1999	56
U1R26	04/07/2001	Scheduled	---
06/30/2002 – End of Third Interval			
U1R27	09/14/2002	Scheduled	---

UNIT 2			
Outage	Start Date	End Date	Length (days)
---	10/01/1972	Commercial Service Date	
U2R01	10/16/1974	12/21/1974	66
U2R02	02/26/1976	03/26/1976	29
U2R03	03/04/1977	04/23/1977	50
U2R04	03/22/1978	04/18/1978	27
U2R05	03/22/1979	04/13/1979	22
U2R06	04/11/1980	05/14/1980	33
U2R07	04/17/1981	05/21/1981	34
U2R08	04/15/1982	05/26/1982	41
U2R09	03/25/1983	07/01/1983	98
U2R10	09/28/1984	11/20/1984	53
U2R11	10/05/1985	11/24/1985	50
U2R12	09/26/1986	11/29/1986	64
U2R13	10/02/1987	11/18/1987	47
U2R14	10/08/1988	11/22/1988	45
U2R15	09/23/1989	11/25/1989	63
U2R16	10/06/1990	11/18/1990	43
U2R17	09/28/1991	11/14/1991	47
U2R18	09/26/1992	11/18/1992	53
U2R19	09/25/1993	10/30/1993	35
U2R20	09/24/1994	11/01/1994	38
U2R21	10/07/1995	12/03/1995	57
U2R22(3)	10/05/1996	08/16/1997	315
U2R23	12/04/1998	03/04/1999	90
U2R24	10/14/2000	12/16/2000	64
U2R25	03/30/2002	Scheduled	---
06/30/2002 – End of Third Interval			
U2R26	09/13/2003	scheduled	

Notes:

1. The U1R11 outage was for steam generator Replacement
2. The outage between U1R23 and U1R24 was for the turbine upgrade and administrative processes updating.
3. The U2R22 outage was for steam generator replacement