

NRC 2001-0037

10 CFR 50.55a

June 4, 2001

Document Control Desk
U. S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-17
Washington, DC 20555-0001

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
ASME SECTION XI RELIEF REQUESTS
UNIT 1 RR-1-24/UNIT 2 RR-2-30
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Every ten years, licensees are required to update their inservice inspection (ISI) programs to the latest ASME Section XI Code referenced in 10 CFR 50.55a. The updates for Point Beach Nuclear Plant (PBNP) Units 1 and 2 will become effective in mid-2002.

We previously submitted Relief Requests RR-1-24 and RR-2-30 by a letter dated February 8, 2001. Subsequent to this submittal, we were informed by the NRC staff that seeking relief was not the appropriate mechanism for requesting an alternative to the Section XI Code specified in 10 CFR 50.55a(b)(2). Further discussions with the staff determined that we should have requested an exemption from the provisions of 10 CFR 50.55a. This request was submitted on April 9, 2001, at which time Relief Requests RR-1-24 and RR-2-30 were withdrawn.

In early May 2001, additional discussions with the NRC staff clarified a relief request was the proper method to request an alternative to the Section XI Code specified in 10 CFR 50.55a(b)(2) but that different sections of 10 CFR 50.55a needed to be referenced than initially specified.

Accordingly PBNP requests an alternative to the Section XI Code specified in 10 CFR 50.55a(b)(2) for the Fourth Interval. This relief is requested in accordance with 10 CFR 50.55a(g)(4), with reference to Paragraph (g)(1) since the Point Beach Nuclear Plant Units 1 and 2 construction permits were issued prior to January 1, 1971.

Attached relief requests RR-1-24 and RR-2-30, for Units 1 and 2 respectively, seek to use the 1998 Edition of ASME Section XI with Addenda through 2000 in lieu of the current Code edition referenced in 10 CFR 50.55a.

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Please contact us if there are any questions regarding these relief requests.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Webb", written in a cursive style.

Thomas J. Webb
Licensing Director

FAF/tyf

Attachment

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

BCC: A. J. Cayia
K. E. Peveler
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R. G. Mende
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T. J. Webb
File

NUCLEAR MANAGEMENT COMPANY, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Unit 1 Relief Request RR-1-24

Unit 2 Relief Request RR-2-30

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(b)(2) - As used in this section, references to Section XI of the ASME Boiler and Pressure Vessel Code refer to Section XI, Division 1, and include editions through the 1995 Edition and addenda through the 1996 Addenda.

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.

Relief Requested:

Relief is requested from using the 1995 Edition of ASME Section XI with Addenda through 1996 for the fourth inspection interval.

This relief will not be applicable to the IWE/IWL containment ISI program or to inservice testing program.

Basis for Relief:

ASME Section XI is a consensus document written by industry representatives with NRC involvement. It is continually evolving to incorporate the latest knowledge and experience of the nuclear industry. This knowledge is gathered by a large range of experts in various technical fields, many of whom are able to test some of the ideas in a controlled environment and/or gather data from sources within the nuclear power and similar industries. The information is then thoroughly discussed to determine its validity to inservice inspection. Analytical analysis is performed on many of the ideas to test their validity.

Peer review is performed during the ASME meetings (and often between committee members outside the conferences) to discuss what improvements are needed and if value can be added to proposed changes. Current requirements are revisited to determine if they are still valid and/or if they should be improved, strengthened or eliminated.

Industry events are brought to the ASME meetings and discussed. This has often led to the incorporation of additional requirements to ensure the focus of inservice inspection is

appropriate. This activity has also refocused inservice inspection requirements to the areas where they are most effective.

The latest editions and addenda of Section XI incorporate the improvements approved by the ASME. Many of the Code Cases the NRC has approved have been incorporated into the most recent editions and addenda. These improvements add value to the ISI process in that they continually refocus the industry on the problem areas and evaluate new developments in technology.

Alternate Requirement:

PBNP Units 1 and 2 will update the ISI programs for both units to the ASME Section XI Code, 1998 Edition with the 2000 Addenda. The updated ISI programs will be effective for the Fourth Interval for each unit.

Nondestructive examination procedures will be updated to the requirements of the 1998 Edition of Section XI with 2000 Addenda, effective for the Fourth Interval. Examinations performed after the ISI program update will be to the new procedures.

PBNP will implement the Appendix VIII supplements of the 1998 Edition of Section XI with Addenda through 2000 on the schedule determined in 10 CFR 50.55a(g)(6)(ii)(C)(1).

Justification of Relief:

Updating to the 1998 Edition with Addenda through 2000 or later Edition of ASME Section XI allows PBNP to use the latest improvements made to the Code as of the date of this relief request. The 1998 Edition with Addenda through 2000 has been announced as the possible replacement for the 1995 Edition with 1996 Addenda of Section XI currently referenced in the Code of Federal Regulations. This change in the regulation is anticipated to become effective after the date PBNP selects the edition/addenda for the Fourth Interval.

Implementation Schedule:

The update to the 1998 Edition of ASME Section XI with Addenda through 2000 or later will be effective for the PBNP Units 1 and 2 Fourth 10-Year Intervals, scheduled to begin on July 1, 2002.