



Kewaunee Nuclear Power Plant
N490 Highway 42
Kewaunee, WI 54216-9511
920.388.2560

Point Beach Nuclear Plant
6610 Nuclear Road
Two Rivers, WI 54241
920.755.2321

Kewaunee / Point Beach Nuclear
Operated by Nuclear Management Company, LLC

NRC 2002-0024

10 CFR 50.55a

March 22, 2002

Document Control Desk
U. S. Nuclear Regulatory Commission
Mail Station P1-17
Washington, DC 20555-0001

Ladies/Gentlemen:

Dockets: 50-266 And 50-301
Fourth Interval Inservice Inspection Program, Plan and Schedule
Point Beach Nuclear Plant, Units 1 And 2

On July 1, 2002, Point Beach Nuclear Plant (PBNP) is required to update the Inservice Inspection (ISI) Program to the 1998 Edition of ASME Section XI with Addenda through 2000 (98A00). This edition and addenda were approved for use via a safety evaluation report (SER) issued by the Commission dated November 6, 2001. The SER contained a provision that PBNP implements the requirements in the proposed rule for 10 CFR 50.55a dated August 3, 2001. The date of the interval update was approved via an SER dated June 18, 2001.

Enclosed is the submittal of the PBNP Fourth Interval ISI Program, Plan and Schedule. This program is submitted in accordance with IWA-1400(c) of the 98A00 Section XI ASME Code. This submittal contains the requirements of the proposed rule change to 10 CFR 50.55a, the 98A00 Edition of Section XI, augmented ISI Programs, several relief requests, and the schedule of examinations for the fourth inservice inspection interval.

The PBNP Class 1, 2, and 3 Inservice Inspection Program details the requirements of 10 CFR 50.55a, ASME Section XI, and applicable relief requests. Augmented programs administered by the ISI program are included. These augmented programs are not required by ASME Section XI. Relief requests that alter the requirements have been incorporated and are listed in Appendix D.

The PBNP Unit 1 Class 1, 2, and 3 Inservice Inspection Program Schedule lists each component subject to examination. The proposed schedule of examinations for PBNP Unit 1 is shown for the fourth inservice inspection interval.

The PBNP Unit 2 Class 1, 2, and 3 Inservice Inspection Program Schedule lists each component subject to examination. The proposed schedule of examinations for PBNP Unit 2 is shown for the fourth inservice inspection interval.

A047

Relief requests are contained in Appendix D of the ISI program document. Each relief request references the applicable article of 10 CFR 50.55a. The relief requests are summarized as follows:

Relief Request 1 requests a common start date of July 1, 2002, for the Fourth Inservice Inspection Interval for both units. Relief was granted by the NRC on June 18, 2001. No additional action is required regarding this relief request.

Relief Request 2 Requests the use of a later ASME Section XI Code Edition than required by 10 CFR 50.55a. Relief was granted by the NRC on November 6, 2001. It allows use of the 1998 Edition of Section XI with Addenda through 2000 provided the proposed rule of August 3, 2001, is followed. No additional action is required regarding this relief request.

Relief Request 3 is the template for the Risk Informed ISI Program. This program will be submitted under separate cover at a later date. It is anticipated this relief request will be submitted in April 2002.

Relief Request 4 proposes use of ASME Code Case N-532-1. This Code case changes the reporting requirements to the NRC of ISI activities.

Relief Request 5 proposes use of ASME Code Case N-533-1. This Code case changes the requirements for the visual examination of insulated bolting on borated systems.

Relief Request 6 proposes use of ASME Code Case N-566-1. This Code case changes the corrective action for leakage identified at bolted connections on borated systems. This allows PBNP to evaluate the leakage with bolting in-place instead of removing the bolting.

Relief Request 7 proposes use of ASME Code Case N-616. This Code case allows use of an alternative VT-2 examination method on bolted connections in borated water systems. If bolting meets specific corrosion resistance requirements, insulation removal is not required.

Relief Request 8 proposes use of ASME Code Case N-624. This Code case allows the required schedule of examination for components to be changed. Section XI requires the same schedule completed during the First Interval to be used during subsequent intervals. Implementation of an RI-ISI Program will not make it possible to adhere to the previous schedule. Adherence to the schedule completed during the First Interval would result in additional radiation exposure and incurred costs.

Relief Request 9 requests an alternative to the welding and brazing performance qualification requirements. This allows personnel qualified at another nuclear plant to transfer training and qualification to PBNP.

Relief Request 10 requests an alternative to the requirement to examine all three vessels of the regenerative heat exchanger. PBNP will examine only one of the three vessels.

Relief Request 11 requests an alternative to the requirement to perform a VT-2 examination on most emergency diesel systems. PBNP will instead credit all other diesel system testing that is performed on a monthly basis.

The Fourth ISI Interval commences July 1, 2002. Approval of the relief requests contained in this program document is requested prior to the start of the Unit 1 Refueling 27 outage, that commences in September 2002.

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
Regulatory Affairs Manager

FAF

Attachment

cc: NRC Resident Inspector (w/o enclosure)
NRC Regional Administrator (w/o enclosure)
NRC Project Manager
PSCW (w/o enclosure)

W/o enclosure
bcc: R. A. Anderson
R. R. Grigg (P460)
K. E. Peveler
D. A. Weaver (P129)
T. J. Taylor

A. J. Cayia
R. G. Mende
R. P. Pulec
T. J. Webb
M. E. Warner

K. M. Duescher (3)
L. Schofield (JOSRC)
M. E. Reddemann
E. J. Weinkam III
File