



Kewaunee Nuclear Power Plant  
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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-02-080

August 26, 2002

10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
NRC Bulletin 2002-02, "Reactor Pressure Vessel Head And Vessel Head Penetration Nozzle Inspection Programs" 15-Day Response

On August 9, 2002, the Nuclear Regulatory Commission (NRC) transmitted Bulletin (BL) 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs." The NRC required that specific information be provided within 30 days of the date of the bulletin. For addressees who chose not to provide the information requested or could not meet the requested completion date, the NRC required a written response within 15 days of the date of the bulletin. In accordance with this requirement, Nuclear Management Company, LLC (NMC) is providing the attached 15-day response for the Kewaunee Plant.


This letter contains the following commitments and no revisions to existing commitments:

- 1. NMC will continue to evaluate non-visual nondestructive examination (NDE) of the reactor pressure vessel head and vessel head penetration nozzles. NMC will complete this review and select appropriate NDE method(s) and, at least nine months prior to the refueling outage that follows the next refueling outage, provide the remaining requested information as described in BL 2002-02.**
- 2. NMC will perform a "100% Bare Metal Visual Examination of CRDM to RPV Junction at Top of RPV Head" during the next refueling outage, currently scheduled for Spring 2003.**

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Docket 50-305  
NRC-02-080  
August 26, 2002  
Page 2

I declare under penalty of perjury that the foregoing is true and accurate.  
Executed on August 26, 2002.



Thomas Coutu  
Site Vice-President  
Kewaunee Nuclear Power Plant

ADB

CC Regional Administrator, USNRC, Region III  
Project Manager, Kewaunee Plant, USNRC, NRR  
NRC Senior Resident Inspector – Kewaunee Plant

Attachment

**ATTACHMENT 1**

**NUCLEAR MANAGEMENT COMPANY, LLC  
KEWAUNEE NUCLEAR PLANT  
DOCKET 50-305**

**August 2002**

**NRC BULLETIN 2002-02: KEWAUNEE PLANT 15-DAY RESPONSE**

NRC BULLETIN 2002-02: REACTOR VESSEL HEAD  
AND VESSEL HEAD PENETRATION NOZZLE INSPECTION PROGRAMS  
KEWAUNEE PLANT 15-DAY RESPONSE

**Required Response 2.**

- (2) *Addressees who choose not to provide the information requested or can not meet the requested completion dates are required to submit written responses within 15 days of the date of this bulletin. The responses must address any alternative course of action proposed, including the basis for the acceptability of the proposed alternative course of action.*

**Response**

**Background**

The effective degradation year (EDY) value for the Kewaunee Plant will be less than twelve at the start of the next refueling outage, which is scheduled to start in Spring 2003. Nuclear Management Company, LLC (NMC) has determined that the EDY for Kewaunee will not exceed 12 EDY until near the end of calendar year 2003.

By letter dated January 3, 2002, NMC submitted the results of our Fall 2001 100% effective visual examination of the reactor vessel head upper metal surface for the Kewaunee Plant in accordance with Nuclear Regulatory Commission (NRC) Bulletin (BL) 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles." No evidence of leakage was discovered.

For the Kewaunee Plant, NMC commits to perform the 100% bare metal visual examination described in BL 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs," during the next (Spring 2003) refueling outage. This commitment meets the suggested supplemental inspection in BL 2002-02 for the next refueling outage for plants with  $\geq 8$  EDY and  $\leq 12$  EDY values. Therefore, NMC meets the requested schedule of BL 2002-02 for activities to be conducted during the Spring 2003 refueling outage for Kewaunee Plant. The remaining two inspection items noted in BL 2002-02, "Example Supplemental Inspections," table would not apply to Kewaunee Plant until the refueling outage that follows the Spring 2003 refueling outage.

**Alternate Course of Action**

NMC will continue to evaluate non-visual nondestructive examination (NDE) of the reactor pressure vessel head and vessel head penetration nozzles. NMC will complete this review and select appropriate NDE method(s) and, at least nine months prior to the refueling outage that follows the next refueling outage, provide the remaining requested information as described in BL 2002-02.

NRC BULLETIN 2002-02: REACTOR VESSEL HEAD  
AND VESSEL HEAD PENETRATION NOZZLE INSPECTION PROGRAMS  
KEWAUNEE PLANT 15-DAY RESPONSE

**Basis for the Acceptability of the Proposed Alternate Course of Action**

The two remaining issues of BL 2002-02 do not require an immediate commitment. Kewaunee is not expected to reach 12 EDY until the end of calendar year 2003. For plants with >12 EDY, BL 2002-02 "Example Supplemental Inspections" table suggests additional inspections within 24 months. The refueling outage subsequent to the Spring 2003 refueling outage is expected to occur in Fall 2004. Because the Fall 2004 refueling outage is expected to occur within 24 months of reaching 12 EDY, any proposed changes to our inspection plans for the Fall 2004 refueling outage would be consistent with the suggested timing for inspections provided by BL 2002-02. NMC's commitment to respond will provide NMC and the NRC the opportunity to evaluate and develop any changes to the inspection program for the reactor pressure vessel head and vessel head penetration nozzles based on industry experience and inspection and repair technology advancements that are expected to be gained in this interim period.