

NRC 2003-0023

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March 10, 2003

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

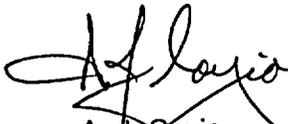
POINT BEACH NUCLEAR PLANT
DOCKETS 50-266 AND 50-301
ADDITIONAL INFORMATION REGARDING FOURTH INTERVAL INSERVICE INSPECTION
PROGRAM RELIEF REQUEST 11

By submittal dated March 22, 2002, Nuclear Management Company, LLC (NMC), submitted the Point Beach Nuclear Plant (PBNP) Fourth Interval ISI Program, Plan and Schedule in accordance with IWA-1400(c) of the 98A00 Section XI ASME Code. Contained in that submittal were several relief requests. Relief Request 11 requested an alternative to the requirement to perform a VT-2 examination on most emergency diesel systems. Instead, PBNP proposed to credit all other diesel system testing that is performed on a regular basis.

During a conference call between NMC representatives and NRC staff on February 21, 2003, NRC staff requested additional information regarding certain aspects of the submittal. Attachment 1 of this letter provides the NMC response to the staff's questions.

This letter contains no new commitments and no revision to existing commitments.

I declare under penalty of perjury that the foregoing is true and accurate.
Executed on March 10, 2003.


A. J. Cayia
Site Vice President
LAS/kmd

Attachment: 1 - Response to Request for Additional Information

cc: Regional Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, NRR, USNRC
NRC Resident Inspector - Point Beach Nuclear Plant

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RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

4TH INTERVAL ISI PROGRAM

RELIEF REQUEST 11

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

The following information is provided in response to the Nuclear Regulatory Commission (NRC) staff's request for additional information on NMC's March 22, 2002 Inservice Inspection Program Relief Request 11 submittal (Reference 1), as discussed during a telephone conference between NRC and NMC staff on February 21, 2003.

The NRC staff's question is restated below, with the NMC response following.

NRC Question:

How effective is PBNP at detecting operational conditions and degradation in the Emergency Diesel Systems?

NMC Response:

Point Beach Nuclear Plant (PBNP) has several types of inspections and testing of the emergency diesel systems. These inspections and tests are required by plant technical specifications and plant procedures. They are performed at regular intervals to ensure the operational status of the diesels. Personnel from different groups perform these inspections and tests.

The following information supports the concept of having the regular testing of the diesels as an alternative to performing the Section XI pressure tests:

- The emergency diesel generators are tested every month by operations personnel, who are often assisted by the system engineers. The diesels are run to test their ability to start when required and to look for any problems that may have occurred while standing idle. During the testing, the diesel systems are examined for leakage.
- The diesels are walked down three times each day by operations personnel. This walkdown looks at the appropriate water level, sump tank fuel level, starting air bank pressure, fuel oil day tank level, service water pressure, glycol expansion tank levels, and storage tanks, and a general look at the diesels. If the readings are not within specifications, the Shift Manager (Duty Shift Supervisor) is informed and appropriate action is initiated.
- The diesels are thoroughly examined as part of Routine Maintenance Procedures. Any significant discrepancies require the initiation of an Action Request and, if appropriate, a Work Order to correct.
- A review of the corrective action program identified 17 instances of leakage associated with the PBNP diesels that had been identified between 1995 and 2002. It was noted that both operations and engineering personnel had written Action Requests, showing both groups were involved in assessing the condition of the diesel systems.
- Based on degradation identified in a portion of the air start piping during routine testing and maintenance of the diesels, PBNP is replacing the carbon steel piping with stainless steel piping. This degradation is currently minor, but as a conservative measure, the piping is being replaced.

- The ISI Program requires periodic pressure testing of the Service Water piping. The Service Water piping goes through and around the diesels G-01 and G-02, and is part of their cooling system. During conduct of the periodic Service Water pressure testing, the VT-2 examiners are required to go around and look above and below the diesels for leakage. The examiners are trained to report any evidence of a discrepant condition, and while not specifically looking at the diesel systems, would likely notice any evidence of obvious leakage.
- The diesel system engineers are required to perform walkdowns at a frequency consistent with the safety and production significance of the system to ensure no obvious problems are present. For the diesels, this has been determined to be at least once each year, which is more frequent than the Section XI requirement. When this walkdown is performed, the engineer is required to look at accessible portions of the system.

PBNP performs frequent inspections and testing of the diesels and associated systems. The inspections and testing has been successful in identifying issues prior to their becoming a problem. The operations and engineering groups are required by procedure to continually monitor the emergency diesels and the associated subsystems. Replacement of degraded components has been performed as these components age. The ISI Group periodically performs VT-2 examinations on systems in close proximity of the diesels. These frequent inspections of the diesels and associated systems adequately determine whether the systems are leak tight.

The above activities provide an alternative to the pressure test requirements, which provides for an acceptable level of quality and safety.

Reference:

Letter to Document Control Desk from T. J. Webb, NRC 2002-0024, dated March 22, 2002.