



January 16, 2004

NRC-04-007
10 CFR 50.55a

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

KEWAUNEE NUCLEAR POWER PLANT
DOCKET 50-305
LICENSE No. DPR-43

In-Service Inspection (ISI) Program Relief Request No. RR-MC-2 For Class MC

The metal containment structures at the Kewaunee Nuclear Power Plant are required to be examined periodically to the specifications of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code Section XI, Subsection IWE. Title 10, Part 50 of the Code of Federal Regulations, Section 50.55a (g) (6) (ii) (B) (1) requires an expedited examination of containment, "... shall implement the in-service examinations specified for the first inspection interval in Subsection IWE of the 1992 Edition with the 1992 Addenda in conjunction with the modifications specified in 10 CFR 50.55a (b) (2) (ix)."

Relief is requested from the requirements specified in Table IWE-2500-1 Examination Category E-D, Seals and Gaskets Item No. E5.10 and Item No. E5.20 of the 1992 Edition 1992 Addenda of Section XI. These requirements are associated with performing visual, VT-3 Examinations of 100% of seals and gaskets on airlocks, hatches and other devices once each interval.

In accordance with 10 CFR 50.55a (a) (3) (i) and 10 CFR 50.55a (g) (5) (iii), description and basis for the relief request, as well as alternative methods of examinations, are provided. Based upon information contained in Relief Request RR-MC-2 for Class MC, the proposal alternatives will provide an acceptable level of quality and safety. This relief has been previously granted to the Point Beach Nuclear Plants (Adams Accession NO. ML012390329) and Prairie Island Nuclear Generating Plants (Adams Accession NO. ML021290428).

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

Thomas Coutu
Site Vice President, Kewaunee Nuclear Power Plant
Nuclear Management Company, LLC

PEB

Enclosure

cc: Administrator, Region III, USNRC
Senior Resident Inspector, Kewaunee, USNRC

A047

ENCLOSURE 1

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

January 16, 2004

Letter from Thomas Coutu (NMC)

To

Document Control Desk (NRC)

NUCLEAR MANAGEMENT COMPANY
KEWAUNEE NUCLEAR POWER PLANT
1st 10-YEAR INTERVAL SEPTEMBER 9, 1996 – SEPTEMBER 9, 2006
REQUEST FOR RELIEF No. RR-MC-2 FOR 1ST TEN YEAR INTERVAL

2 Pages Follow

**NUCLEAR MANAGEMENT COMPANY
KEWAUNEE NUCLEAR POWER PLANT
1st 10-YEAR INTERVAL SEPTEMBER 9, 1996 – SEPTEMBER 9, 2006
REQUEST FOR RELIEF No. RR-MC-2 FOR 1ST TEN YEAR INTERVAL**

1. COMPONENTS AFFECTED

Seals and gaskets of Class MC pressure retaining components and metallic liners of Class CC Components, Examination Category E-D, Item No. E5.10 and Item No. E5.20 of IWE-2500, Table IWE-2500-1, ASME Section XI 1992 Edition, 1992 Addenda.

<u>Component</u>	<u>Isometric</u>
Electrical Penetration No. C-10	M-1727
Electrical Penetration No. F-8	M-1727
Containment Vacuum Breaker Valve VB-10A at Penetration No. 41S/S	M-1727

2. SECTION XI REQUIREMENTS

IWE-2500, Table IWE-2500-1 requires seals and gaskets on airlocks, hatches, and other devices to be visually examined, VT-3, once each interval to ensure containment leak-tight integrity.

3. BASIS FOR REQUESTING RELIEF

10CFR50.55a was amended in the Federal Register (61FR41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. Seals and gaskets receive a 10CFR50 Appendix J Test. As noted in 10CFR50 Appendix J, the purpose is to measure leakage of containment or penetrations whose design incorporates resilient seals, gaskets, sealant compounds, and electrical penetrations fitted with flexible metal seal assemblies. Although not required by Code, practical examination considerations of seals and gaskets require the joints, which are proven adequate through Appendix J testing be disassembled. For electrical penetrations No. C-10 and No. F-8 and Containment Vacuum Breaker Valve VB-10A, at Penetration No. 41S/S this would involve a pre-maintenance Appendix J test, determination of cables at electrical penetrations if enough cable slack is not available, disassembly of the joint, removal and examination of the seals and gaskets, reassembly of the joint, re-termination of the cables if necessary, post-maintenance testing of the cables, and a post-maintenance Appendix J test of the penetration. This imposes the risk that the equipment could be damaged. The 1992 Edition, 1993 Addenda, of Section XI recognizes that the disassembly of joints to perform these examinations is not warranted. Note 1 in the Examination Category E-D was modified in the 1995 Edition of Section XI to state that sealed or gasket connections need not be disassembled solely for performance of examinations. However without disassembly, most of the surface of the seals and gaskets would be inaccessible.

NUCLEAR MANAGEMENT COMPANY
KEWAUNEE NUCLEAR POWER PLANT
1st 10-YEAR INTERVAL SEPTEMBER 9, 1996 – SEPTEMBER 9, 2006
REQUEST FOR RELIEF No. RR-MC-2 FOR 1ST TEN YEAR INTERVAL

For those penetrations that are routinely disassembled, a Type B test is required upon final assembly and prior to start-up. Since the Type B test will assure leak-tight integrity of primary containment, the performance of the visual examination would not increase the level of safety or quality. Seals and gaskets are not part of the containment pressure boundary under current Code rules (NE-1220(b)). When the Electrical and Vacuum Breaker Penetrations containing these materials are tested in accordance with 10CFR50, Appendix J, degradation of the seal or gasket material would be revealed by an increase in the leakage rate. Corrective measures would be applied and the component retested. Repair or replacement of seals and gaskets is not subject to Code (1992 Edition, 1992 Addenda) rules in accordance with Paragraph IWA-4111(b)(5) of ASME Section XI.

The visual examination of seals and gaskets in accordance with IWE-2500, Table IWE-2500-1, is a burden without any compensating increase in the level of safety or quality. This requirement is not included in ASME Section XI 1998 Edition 2000 Addenda.

Relief is requested in accordance with 10CFR50.55a(a)(3)(ii). Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Testing the seals and gaskets in accordance with 10CFR50, Appendix J will provide adequate assurance of the leak-tight integrity of the seals and gaskets.

4. ALTERNATIVE METHODS OF EXAMINATION

The leak-tightness of seals and gaskets for Electrical Penetrations No. C-10 and No. F-8 and Vacuum Breaker Valve VB-10A at Penetration No. 41S/S will be tested in accordance with 10CFR50, Appendix J, Type B Test. No additional alternatives to the visual examination, VT-3, of the seals and gaskets will be performed unless the Flange Connections for Electrical Penetrations No. C-10 and No. F-8 and Vacuum Breaker Valve VB-10A at Penetration No. 41S/S are disassembled for maintenance. At that time a VT-3 as required by ASME Section XI 1992 Edition 1992 Addenda will be performed.

5. IMPLEMENTATION SCHEDULE

Relief is requested for the 1st Ten Year Inservice Inspection Interval that began on September 9, 1996 and ends on September 9, 2006.