



February 16, 2004

NRC-04-018  
10CFR50.55a

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

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

Request For Approval To Use A Later OM Code For Inservice Testing Of  
Pressure Relief Devices

The Federal Register, Vol. 67, No. 187 dated Thursday, September 26, 2002 incorporates by reference the 1997 Addenda, 1998 Edition through 2000 Addenda of the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for Inservice Testing (IST) programs. Currently the Kewaunee Nuclear Power Plant is committed to the 1989 Edition of the ASME Section XI Code that invokes the 1987 Edition and 1988 Addenda of the OM Code.

The NMC requests approval for the Kewaunee Nuclear Power Plant, pursuant to 10 CFR 50.55a(f)(4)(iv), to use the later edition and addenda of the OM Code that has been approved for use by the NRC for pressure relief devices subject to IST requirements for the remainder of the third 10-year IST interval. Mandatory Appendix I, Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants, of the later edition and addenda of the OM Code, contains the requirements for IST of pressure relief devices. The Kewaunee Nuclear Power Plant will use all related requirements of the respective edition and addenda in Mandatory Appendix I as required by 10 CFR 50.55a(f)(4)(iv) for the use of subsequent editions and addenda of the OM Code.

Attachment 1 presents this request in accordance with template 3 of the September 30, 2002 NEI White Paper, "Standard Format For Requests From Commercial Reactor Licensees Pursuant to 10 CFR 50.55a."

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If there are any questions or if additional information is required, please contact Gerald Riste at (920) 388-8424 or Tim Smith at (920) 388-8660.



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

TMS

cc- Administrator, Region III, USNRC  
Project Manager, Kewaunee Nuclear Power Plant, USNRC  
Senior Resident Inspector, Kewaunee Nuclear Power Plant, USNRC  
Electric Division, PSCW

Enclosure 1) Proposed Use of Subsequent ASME Code Edition and  
Addenda In Accordance with 10 CFR 50.55a(f)(4)(iv)

ENCLOSURE 1

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

**February 16, 2004**

Letter from Thomas Coutu (NMC)

To

Document Control Desk (NRC)

Proposed Use of Subsequent ASME Code Edition and Addenda  
In Accordance with 10 CFR 50.55a(f)(4)(iv)

1 Page Follows

Proposed Use of Subsequent ASME Code Edition and Addenda  
In Accordance with 10 CFR 50.55a(f)(4)(iv)  
at Kewaunee Nuclear Power Plant

1. ASME Code Component(s) Affected

Pressure relief devices subject to Inservice Testing (IST) requirements.

2. Applicable Code Edition and Addenda

1989 Edition of the ASME Section XI Code

ASME OMa-1988 Part 10 Inservice Testing of Valves in Light-Water  
Reactor Power Plants

ASME OM-1987, Part 1 Requirements for Inservice Performance Testing  
of Nuclear Power Plant Pressure Relief Devices

3. Proposed Subsequent Code Edition and Addenda

1998 Edition through 2000 Addenda of the ASME Code for Operation and  
Maintenance of Nuclear Power Plants (OM Code), Appendix I, Inservice  
Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power  
Plants.

The Federal Register, Vol. 67, No. 187 dated Thursday, September 26,  
2002 (67 FR 60520) incorporates by reference the 1997 Addenda, 1998  
Edition through 2000 Addenda of the ASME Code for Operation and  
Maintenance of Nuclear Power Plants (OM Code) for Inservice Testing  
(IST) programs.

Mandatory Appendix I will be applied to all pressure relief devices subject  
to Inservice Testing (IST) requirements.

4. Related Requirements

There are no modifications or limitations listed in 10 CFR 50.55a(b) that  
apply to the use of Mandatory Appendix I. Review of the Federal Register  
67 FR 60520 through 67 FR 60542 did not identify any pertinent  
information related to pressure relief devices or Mandatory Appendix I.

5. Duration of Proposed Request

The NMC requests approval for the Kewaunee Nuclear Power Plant,  
pursuant to 10 CFR 50.55a(f)(4)(iv), to use the later edition and addenda  
of the OM Code that has been approved for use by the NRC for pressure  
relief devices subject to IST requirements for the remainder of the third 10-  
year IST interval.