

March 10, 2004

Mr. Thomas Coutu  
Site Vice President  
Kewaunee Nuclear Power Plant  
Nuclear Management Company, LLC  
N490 State Highway 42  
Kewaunee, WI 54216

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - REQUEST FOR APPROVAL TO USE  
MORE RECENT INSERVICE TESTING REQUIREMENTS FOR PRESSURE  
RELIEF DEVICES (TAC NO. MC2080)

Dear Mr. Coutu:

By letter dated February 16, 2004, Nuclear Management Company, LLC (NMC) requested the Nuclear Regulatory Commission's (NRC's) approval to use a portion of a more recent edition and addenda of the American Society of Mechanical Engineers (ASME) *Code for Operation and Maintenance of Nuclear Power Plants* (OM Code) for testing pressure relief devices in the Kewaunee Nuclear Power Plant (KNPP) inservice testing (IST) program.

The current Code of record for the KNPP IST program is the 1989 Edition of the ASME *Boiler and Pressure Vessel Code*, Section XI. The 1989 ASME Code, Section XI references ASME OM Standards Part 1, Part 6, and Part 10 for its IST requirements. NMC requested approval to use Appendix I, "Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants," of the 1998 Edition up to and including the 2000 Addenda of the ASME OM Code for the remainder of the third 10-year IST interval.

The regulation in Title 10 of the *Code of Federal Regulation* (10 CFR) Section 50.55a(f)(4)(iv) states that IST of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in 10 CFR 50.55a(b), subject to NRC approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions and addenda are met.

The 1998 Edition through 2000 Addenda to the ASME OM Code was incorporated by reference into 10 CFR 50.55a(b) on September 26, 2002 (67 FR 60520), with no modifications or limitations placed on Mandatory Appendix I requirements.

The NRC finds that all related requirements in Appendix I of the ASME OM Code, 1998 Edition through 2000 Addenda have been met by NMC's submittal.

Therefore, the request to use the portion of a later Code and Addenda associated with the IST of pressure relief devices at Kewaunee Nuclear Power Plant submitted by NMC in its letter dated February 16, 2004, is approved pursuant to 10 CFR 50.55a(f)(4)(iv).

T. Coutu

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If you have any questions regarding this matter, please contact John G. Lamb at (301) 415-1446.

Sincerely,

***/RA/***

L. Raghavan, Section Chief, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-305

cc w/encl: See next page

T. Coutu

- 2 -

If you have any questions regarding this matter, please contact John G. Lamb at (301) 415-1446.

Sincerely,

**/RA/**

L. Ragahavan, Section Chief, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-305

cc w/encl: See next page

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\*See memo

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Kewaunee Nuclear Power Plant

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