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Committed to Nuclear Excellence

Kewaunee / Point Beach Nuclear
Operated by Nuclear Management Company, LLC

March 15, 2004

NRC 2004-0025
10 CFR 50.55a

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

Point Beach Nuclear Plant, Unit 1
Docket 50-266
License No. DPR-24
Response to Request for Additional Information Regarding Relief Request VRR 03-01

Reference: 1) Letter from NMC to NRC, "VRR 03-01, Request for Extension to Perform Inservice Testing of 1RH-861C," dated February 10, 2004 (NRC 2004-0014).

In Reference 1, Nuclear Management Company, LLC, (NMC) submitted a request for relief from the requirements of subarticle 1.3.5 of Mandatory Appendix I of the American Society of Mechanical Engineer's Operations and Maintenance Code, 1995 Edition with 1996 Addenda. The proposed one-time relief was requested to extend the 10-year inservice testing (IST) interval of relief valve 1RH-861C by approximately seven months.

On February 20, 2004, the Nuclear Regulatory Commission (NRC) requested additional information in support of their review of Reference 1.

Enclosure 1 of this letter contains the NMC's response to the staff's questions.

This letter contains no new commitments or changes to existing commitments.

Gary D. Van Middlesworth
Site Vice-President, Point Beach Nuclear Plant
Nuclear Management Company, LLC

Enclosures

A047

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
PSCW

ENCLOSURE 1

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION REGARDING VRR 03-01, REQUEST FOR EXTENSION TO PERFORM INSERVICE TESTING OF 1RH-861C

NRC Question:

In addition to the 10-year test frequency requirement, address the 48-month test requirement to test 20% of the valves within this valve group. The subject valve is the only valve in its group, so it would also need to be tested at least every 48 months.

NMC Response:

As discussed below, the subject valve, 1RH-861C, is part of a valve group consisting of 12 valves. Therefore, it does not need to be tested every 48 months.

Point Beach Nuclear Plant (PBNP) grouped valves during the third 10-year Inservice Testing (IST) Program interval. Requirements for this interval came from the 1986 Edition of ASME Section XI, as required by 10 CFR 50.55a. This 1986 Edition of ASME Section XI states:

IWV-3512 Test Procedure:

> Safety and relief valves shall be tested as required by the periodic testing requirement and test method of ANSI/ASME OM-1-1981 [Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices].

The OM-1-1981 Edition has the following requirement:

1.3.4.1.2 Subsequent 10 Year Periods.

> All valves of each type and manufacture shall be tested within each subsequent 10 year period, with a minimum of 20% of the valves tested within any 48 months. The 20% shall be previously untested valves, if they exist.

In accordance with the OM-1-1981 requirement, valves of the same type and manufacturer were grouped together for the third 10-year interval. That grouping consisted of top guided, spring operated, nozzle type Crosby manufactured relief valves for water service. Enclosure 2 contains a table with a complete listing of the 12 valves within this group. The table shows the last test date for each valve. This data indicates that the 20% requirement was met for this group of valves. The PBNP testing frequency for the third 10-year interval was satisfactorily met.

PBNP is currently operating in the fourth 10-year interval of the IST Program. This interval began on September 1, 2002, for PBNP Unit 1. With the fourth interval, the IST Program was updated to the latest Edition and Addenda of the OM Code approved

12 months prior to the beginning of the interval (i.e., ASME OM Code, 1995 Edition with 1996 Addenda, as required by 10 CFR 50.55a).

The following is an excerpt from the 1995 Edition with Addenda through 1996 of the OM Code:

I 1.3.5 Test Frequency, Class 2 and 3 Pressure Relief Valves
(a) 10-year test interval. Class 2 and 3 pressure relief valves, with the exception of PWR main steam safety valves, shall be tested every 10 years, starting with initial electric power generation. No maximum limit is specified for the number of valves to be tested during any single plant operating cycle; however, a minimum of 20% of the valves from each valve group shall be tested within any 48 month interval. This 20% shall consist of valves that have not been tested during the current 10-year test interval, if they exist.

I 1.2 Definitions
valve group – valves of the same manufacturer, type, system application, and service media.

With the IST program update for the fourth interval in 2002, the valve groupings were not revised, as the grouping met the code requirements. The valves are from the same manufacturer, are the same type of valve, have the same application in similar systems, and work with water. With the request proposed in Reference 1 to extend the time period to perform inservice testing on 1RH-861C to approximately 10 years, 7 months, PBNP will still meet the 48 month sampling requirement of the 1995 Edition with Addenda through 1996 of the OM Code.

As previously stated, the applicable OM Code requires that 20% of the valves from each valve group shall be tested within any 48 month interval and that valves shall be tested every 10 years. During the time period between September 1, 2002, and August 31, 2006 (i.e., the first 48 months of the fourth 10-year interval at PBNP), three of the valves must be tested. Valve 1RH-861C was scheduled to be tested during the April 2004 outage (U1R28), but with NRC approval of Reference 1, its testing will be deferred until the October 2005 outage (U1R29). Valves 1RH-861B and 1CV-314 are also scheduled for testing during the October 2005 outage. Even though no testing will be performed during the U1R28 outage, the current test schedule will meet the requirement to test 20% of the valve group in 48 months.

Relief valve 1RH-861B, which is in close proximity and in the same part of the system as 1RH-861C, was included in the portion of the valve group tested in 1998. 1RH-861B was tested with satisfactory results. This provides additional confidence that this part of the system is protected from over-pressurization.

Valve 1RH-861C is part of a group of 12 valves. This valve group has met the requirement for the testing of at least 20% of the group every 48 months. With the satisfactory test results of similar valves (i.e., one valve in 1995, one valve in 1996,

three valves in 1998, two valves in 2001, and four valves in 2002), there is reasonable assurance that the system is adequately protected. Performing the test during the April 2004 outage would result in hardship without a compensating increase in the level of quality and safety.

ENCLOSURE 2

TABLE 1:
LISTING OF VALVES IN VALVE GROUP
WITH TEST DATA FOR EACH VALVE

1 page follows

TABLE 1

Group	Unit	Equip #	Drawing	Program (IST, AD, EJ, Pending)	Section XI class (1, 2, 3)	Manufacturer	Last test date	Test Work Order
1-9	1	RH-00861C	WEST 110E018 SH 1	IST	2	CROSBY	3/25/1995	9501965
1-9	1	CV-00314	WEST 684J741	IST	2	CROSBY	4/8/1996	9600589
1-9	1	RH-00861B	WEST 110E018 SH 1	IST	2	CROSBY	4/8/1998	9715817
1-9	1	SI-00887	WEST 110E017 SH 1	IST	2	CROSBY	4/15/1998	9709382
1-9	1	CV-00283C	WEST 684J741	IST	2	CROSBY	8/17/1998	9809659
1-9	1	CC-00768	WEST 110E018 SH 2	IST	2	CROSBY	4/14/2001	9931001
1-9	1	SI-00861A	WEST 110E017 SH 1	IST	2	CROSBY	4/22/2001	9931002
1-9	1	CV-00203	WEST 684J741	IST	2	CROSBY	9/25/2002	0207001
1-9	1	CC-00763A	WEST 110E018 SH 2	IST	2	CROSBY	9/25/2002	0206803
1-9	1	CV-00283B	WEST 684J741	IST	2	CROSBY	12/26/2002	0206362
1-9	1	CV-00283A	WEST 684J741	IST	2	CROSBY	12/30/2002	0206361