



April 29, 2004

NRC-04-050
10 CFR 50.55a

U.S. Nuclear Regulatory Commission
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KEWAUNEE NUCLEAR POWER PLANT
DOCKET 50-305
LICENSE NO. DPR-43

KEWAUNEE NUCLEAR POWER PLANT INTENT TO EXTEND THE THIRD TEN-YEAR INTERVAL OF THE IN-SERVICE TESTING PROGRAM

The purpose of this letter is to inform the NRC that the Nuclear Management Company intends to extend the current Third Ten-Year Interval of Kewaunee Nuclear Power Plant In-service Testing Program. This extension is being made in accordance with guidance contained in Section 3.3 of NUREG 1482, "Guidelines for In-service Testing at Nuclear Power Plants." This guidance includes the recommendation that the licensee inform the NRC of any extension before the date that would have been the end of the current interval.

The NUREG identifies that ASME Code, Section XI, Subsection IWA-2430 Inspection Intervals, applies to IST intervals. The current applicable Code of record for the Kewaunee Nuclear Power Plant is ASME Code, Section XI, 1989 Edition. Subsection IWA-2430 (e) states: "In addition to (c) and (d) above, for power units that are out of service continuously for 6 months or more, the inspection interval during which the outage occurred may be extended for a period equivalent to the outage and the original pattern of intervals extended accordingly for successive intervals."

In addition to the NUREG 1482 guidance the 1998 Edition of ASME OM Code, Subsection ISTA, Paragraph ISTA-3130 (e) states: "In addition to ISTA-3130 (d), for units that are out of service continuously for 6 months or more, the in-service test interval during which the outage occurred may be extended for a period equivalent to the outage and the original pattern of intervals extended accordingly for successive intervals." The 1998 Edition through the 2000 Addenda of the ASME OM Code was incorporated by reference into 10 CFR 50.55a(b) on September 26, 2002 (67 FR 60520).

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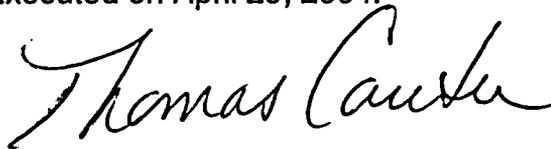
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The Kewaunee plant experienced an extended outage for steam generator tube repairs in 1996 and 1997. The plant was placed in the hot shutdown condition on September 20, 1996, and in cold shutdown on September 21, 1996, in preparation for the scheduled refueling outage. During the course of the outage, repairs were required for numerous steam generator tubes. The plant re-entered cold shutdown on June 7, 1997, and hot shutdown on June 9, 1997, during plant start up. This resulted in an extended outage of approximately eight and one half months, thereby exceeding the Code required six-month duration.

Kewaunee currently intends to use an eight-month extension to identify and implement program and procedure changes required by the newer Code editions. The third interval will therefore be extended from June 15, 2004, and will expire on February 15, 2005, with the fourth interval commencing on February 16, 2005. The new Code of record will be the 1998 Edition through the 2000 Addenda of the ASME OM Code. This Code was chosen in accordance with 10 CFR 50.55a(f)(4)(ii). Requests for relief associated with the updated program will be submitted to the NRC six months prior to the new interval start date.

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

I declare under penalty of perjury that the foregoing is true and accurate.
Executed on April 29, 2004.



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

cc: Administrator, Region III, USNRC
Project Manager, Kewaunee, USNRC
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