

August 11, 2004

Mr. Thomas Coutu
Site Vice President
Kewaunee Nuclear Power Plant
Nuclear Management Company, LLC
N490 State Highway 42
Kewaunee, WI 54216-9511

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - NOTIFICATION OF NRC
INSPECTION AND REQUEST FOR INFORMATION

Dear Mr. Coutu:

On August 30, 2004, the NRC will begin an inspection of the replacement reactor vessel head fabrication records (NRC Procedure 71007, "Reactor Vessel Head Replacement Inspection") at the Kewaunee Nuclear Power Plant. This on-site inspection is scheduled to be performed beginning the week of August 30, 2004, and is scheduled to conclude on December 9, 2004.

It is expected that this inspection will be resource intensive both for the NRC inspector and your staff. In order to minimize the impact to your on-site resources and to ensure a productive inspection for both sides, we have enclosed a request for documents needed for this inspection. It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the inspection. These documents are needed by the inspector upon arrival at the site on August 30, 2004. However, we recognize that some of these documents may not be available during the first week of our inspection and we request that your staff provide the inspector with the availability date(s) for any outstanding documents not available on August 30, 2004.

We have discussed the detailed schedule for these inspection activities with your staff and understand that our regulatory contact for this inspection will be J. Riste of your organization. If there are any questions about this inspection or the material requested, please contact the inspector Mel Holmberg at (630) 829-9748.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

David Hills, Chief
Mechanical Engineering Branch
Division of Reactor Safety

Docket Nos. 50-305
License Nos. DPR-43

Enclosure: HEAD FABRICATION INSPECTION
DOCUMENT REQUEST

cc w/encl: J. Cowan, Executive Vice President,
Chief Nuclear Officer
Plant Manager
Manager, Regulatory Affairs
J. Rogoff, Vice President, Counsel & Secretary
D. Molzahn, Nuclear Asset Manager,
Wisconsin Public Service Corporation
L. Weyers, Chairman, President and CEO,
Wisconsin Public Service Corporation
D. Zellner, Chairman, Town of Carlton
J. Kitsembel, Public Service Commission of Wisconsin

A. Coutu

-2-

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Chief Nuclear Officer
Plant Manager
Manager, Regulatory Affairs
J. Rogoff, Vice President, Counsel & Secretary
D. Molzahn, Nuclear Asset Manager,
Wisconsin Public Service Corporation
L. Weyers, Chairman, President and CEO,
Wisconsin Public Service Corporation
D. Zellner, Chairman, Town of Carlton
J. Kitsembel, Public Service Commission of Wisconsin

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HEAD FABRICATION INSPECTION DOCUMENT REQUEST

Inspection Dates: August 30, 2004 through December 9, 2004
Inspection Procedures: IP 71007 "Reactor Vessel Head Replacement Inspection"
Inspector: Mel Holmberg (630) 829-9748

Information To be Provided at the Entrance Meeting

The following information is requested to be provided to the inspector at the entrance meeting on August 30, 2004. If some of the requested information is not available by this date, please identify the dates when this information will be provided to the inspector to complete the NRC's review of head fabrication records. If you have any questions regarding this information, please call the inspector as soon as possible.

- 1) Copy available (in resident inspector office) of the applicable Edition/Addenda for the ASME Code Sections II, III, V, IX, XI and Code Cases used in fabrication of the replacement head.
- 2) Copy available (in resident inspector office) of the ASTM Standards for material specifications used in the replacement head.
- 3) Copy of the receipt inspection checklist used to confirm lack of shipping damage to the replacement head. Additionally, the inspector requests to observe any licensee staff examinations of the head which occur during the onsite inspection weeks.
- 4) Copy of the as-built fabrication drawing(s) for the replacement head including head cladding thickness and nondestructive examinations (NDE).
- 5) Index with short description of the radiographic records for the replacement head including access to these records and a film reader.
- 6) Index with short description of the Audit/Surveillance reports (including the communication issue resolution sheets) for the replacement head fabrication and an index with short description of audit or surveillance report findings (NCR, CRs, etc).
- 7) Copy of Contract and Code specifications for materials used in the head forging, head studs and nuts (if new materials are to be used in conjunction with the head replacement) and vessel head penetration nozzles. For these components copies of heat treatment records including:
 - a) plots of furnace temperature vs time (if available) or documentation that required temperatures and times were achieved to meet material specifications,
 - b) audits or surveillance reports (including nonconformance or deficiency reports with resolution) of vendor heat treatment procedures, including furnace calibration, numbers and placement of thermocouples and quenching/cooling rates, and
 - c) Certified Mill Test Reports (CMTRs).

- 8) Identify areas repaired in the head forging, penetration nozzles (and associated attachment welds) and head cladding and identify if these repairs were made prior to or following component heat treatments to meet the material specifications (include nonconformance or deficiency reports with resolution for each repair). For these components provide a copy of:
- a) documents with detailed records of the location and type of repairs made including how the applicable Code and contract specifications were met for the repaired areas;
 - b) CMTRs for weld filler materials used in these repairs; and
 - c) audit or surveillance records of welder qualifications for welders that performed repair work and any nonconformance reports.
- 9) Copy of the Code Data Report(s) for the replacement head which confirms that the head meets applicable design requirements and was certified by a professional engineer. This documentation should include confirmation that the original vessel N-stamp remains valid and may include rubbings taken of the NPT stamp on the replacement head.
- 10) Copy of the Design Specifications for the original and replacement head certified by a professional engineer. Copy of the Certified Design Report reconciling the design changes and changes in Code requirements for the replacement head.
- 11) Copy of Audits or Surveillance Reports of:
- a) machining completed on the vessel head forging or penetration nozzles;
 - b) part identification and traceability;
 - c) drawing and drawing change controls; and
 - d) welder qualifications for welders that performed welding of nozzle-to-head welds or head cladding.
- These audits should include any nonconformance or deficiency reports with the approved resolution.
- 12) Copies of Section XI replacement head preservice examination records including preservice volumetric examination records for the penetration nozzle-to-head welds which may be used as baseline inspections for subsequent examinations required by NRC Order EA-03-009. Additionally, a copy of the ASME Code Section III data package including hydrostatic test records for the replacement vessel head.
- 13) Copies of fabrication process sheets or other records which confirm that the required finished machining of surfaces was completed as specified on the fabrication drawings or contract specifications for the replacement head. Copies of contract specifications for surface finish on the replacement vessel head subcomponents.

- 14) For the head forging, head studs & nuts (if new materials are to be used in conjunction with the head replacement), penetration nozzles and head cladding copies of the nondestructive examination (NDE) records (if available) or records that the required NDE was completed to meet the material specifications (e.g., verification steps in project plan, MHI fabrication process sheets or weld data sheets).
- 15) Copies of welding records for the head cladding and penetration nozzle-to-head welds including: weld procedures and supporting procedure qualification records, weld data sheets and CMTRs. If these records are not available, provide audit or surveillance records of these activities including any non-conformance reports and resolution.