

September 16, 2004

Mr. Dennis L. Koehl
Site Vice President
Nuclear Management Company, LLC
6610 Nuclear Road
Point Beach Nuclear Plant
Two Rivers, WI 54241

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2, LICENSE RENEWAL
APPLICATION (TAC NOS. MC2099 AND MC2100)

Dear Mr. Koehl:

By letter dated February 25, 2004, Nuclear Management Company, LLC (NMC) submitted an application pursuant to 10 CFR Part 54, to renew the operating licenses for Point Beach Nuclear Plant, Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC). The NRC staff is reviewing the information contained in the license renewal application (LRA) and has identified, in the enclosure, areas where additional information is needed to complete the review. Specifically, the enclosed request for additional information (RAI) are from Aging Management Program XI.M33, Selective Leaching of Material.

This RAI, in a draft format, have been provided to Mr. Jim Knorr of your staff on September 1, 2004. The NRC staff has discussed draft versions of this RAI, via a telephone conference call, to provide clarifications to the NMC staff on September 2, 2004. Your response to this RAI is requested within 30 days from the date of this letter. Mr. Knorr has agreed to this request. If needed, the NRC staff is willing to meet or discuss with NMC again prior to the submittal of the applicant's response to provide clarifications to the staff's RAI.

If you have any questions, please contact me at 301-415-2232 or e-mail mjm2@nrc.gov.

Sincerely,

/RA/ Samson Lee for

Michael J. Morgan, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure: As stated

cc w/encl: See next page

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Michael J. Morgan, Project Manager
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**REQUEST FOR ADDITIONAL INFORMATION
POINT BEACH NUCLEAR PLANT (PBNP), UNITS 1 & 2
LICENSE RENEWAL APPLICATION**

RAI B.2.1.13-1:

NUREG-1801 (GALL Report) Aging Management Program (AMP) XI.M33, "Selective Leaching of Material," program Element 4. "Detection of Aging Effects" established the following criteria:

The one-time visual inspection and hardness measurement includes close examination of a select set of components to determine whether selective leaching has occurred and whether the resulting loss of strength and/or material will affect the intended functions of these components during the period of extended operation. Selective leaching generally does not cause changes in dimensions and is difficult to detect. However, in certain brasses it causes plug-type dezincification, which can be detected by visual inspection. One acceptable procedure is to visually inspect the susceptible components closely and conduct Brinell Hardness testing on the inside surfaces of the selected set of components to determine if selective leaching has occurred. If it is occurring, an engineering evaluation is initiated to determine acceptability of the affected components for further service.

The Point Beach LRA Section B.2.1.13, "One-Time Inspection Program," is used to manage the selective leaching aging mechanism and is cited as being consistent with GALL Report AMP XI.M33, with exceptions. The LRA identifies the following exception to GALL Report AMP XI.M33:

This element includes exceptions to the corresponding NUREG-1801, Section XI.M33, "Selective Leaching of Materials" aging management program element. Section XI.M33 of NUREG-1801 states that hardness measurements are performed on a select set of components. The internal surfaces of susceptible components may not be accessible for hardness measurements due to the size of the component. Therefore, only visual inspections are required by the program. Hardness measurements may be performed in accessible locations to confirm the absence of selective leaching and determine material properties which can be used in component functionality assessments.

The NRC project team conducted discussions concerning this exception with PBNP personnel during its site visits. The project team has further evaluated this exception and is unable to reconcile how leaching of cast iron and brass would be effectively managed using only visual inspection; that is without performance of hardness testing on the inside surfaces of the **selected set of components**. The inability to reconcile this exception is predicated on XI.M33, which indicates that visual inspections are generally unable to detect leaching. However, the project team acknowledges that components with limited accessibility may be one factor in choosing the "selected set of components" upon which the hardness tests are to be performed.

Enclosure

The PBNP exception indicates that “hardness measurements **may be** performed,” which therefore makes hardness testing optional. This is an important consideration in the project team’s evaluation of this exception.

PBNP is requested to provide additional information that demonstrates that visual inspection alone will guarantee detection of leaching in cast iron and brass materials. Otherwise please indicate whether or not the Nuclear Management Company will be perform a one-time visual inspection and hardness measurement on select set of components, of each material type, to determine whether selective leaching has occurred and whether the resulting loss of strength and/or material will affect the intended functions of these components during the period of extended operation.

Point Beach Nuclear Plant, Units 1 and 2

cc:

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