

October 28, 2004

NRC-04-129  
10 CFR 50.54(f)

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, Maryland 20852

Kewaunee Nuclear Power Plant  
Docket 50-305  
License No. DPR-43

Generic Letter 2004-01: Requirements For Steam Generator Tube Inspections 60-Day Response

On August 30, 2004, the Nuclear Regulatory Commission (NRC) transmitted Generic Letter (GL) 2004-01. The NRC required that specific information be provided within 60 days of the date of the GL. Enclosure 1 contains the Nuclear Management Company, LLC (NMC) response to GL 2004-01 for the Kewaunee Nuclear Power Plant.

Summary of Commitments

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

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on October 28, 2004.



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

Enclosures (1)

cc : Administrator, Region III, USNRC  
Project Manager, Kewaunee Nuclear Power Plant, USNRC  
Senior Resident Inspector, Kewaunee Nuclear Power Plant, USNRC  
Electric Division, PSCW

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**ENCLOSURE 1**  
**GENERIC LETTER 2004-01**  
**KEWAUNEE NUCLEAR POWER PLANT 60-DAY RESPONSE**

***Nuclear Regulatory Commission (NRC) Requested Information***

- 1) *Addressees should provide a description of the SG tube inspections performed at their plant during the last inspection. In addition, if they are not using SG tube inspection methods whose capabilities are consistent with the NRC's position, addressees should provide an assessment of how the tube inspections performed at their plant meet the inspection requirements of the TS in conjunction with Criteria IX and XI of 10 CFR Part 50, Appendix B, and corrective action taken in accordance with Appendix B, Criterion XVI. This assessment should also address whether the tube inspection practices are capable of detecting flaws of any type that may potentially be present along the length of the tube required to be inspected and that may exceed the applicable tube repair criteria.*

**Nuclear Management Company, LLC (NMC) Response**

Steam Generator tube inspections performed at Kewaunee Nuclear Power Plant are consistent with the NRC's position regarding tube inspections.

Kewaunee Nuclear Power Plant has two Westinghouse Model 54F steam generators. The tubing material in each of the steam generators is Inconel Alloy 690 thermally treated. In addition, the first 8 rows had the u-bend area stress relieved after bending. The tubes are fully hydraulically expanded into the tube sheet.

Nuclear Management Company performed the following steam generator tube inspections at Kewaunee Nuclear Power Plant during the last inspection completed on 04/19/2003. This scope applies to both SGs.

- 100% full length bobbin coil inspection
- 20% hot leg top of tubesheet (TTS) with 3-coil +Point RPC (+/- 2 inches)
- 20% U-bend +Point RPC of row 1 (top of TSP to top TSP)
- RPC of all I-codes, dings/dents 5 volts or greater (special interest) and Possible Loose Parts (PLP's)

Nuclear Management Company uses tube inspection methods that are capable of detecting flaw types that may be present. Prior to each inspection, a degradation assessment, which includes operating experience, is performed to identify degradation mechanisms that may be present, and a technique validation assessment is performed to verify that the eddy current techniques are capable of detecting those flaw types identified in the degradation assessment.

### **NRC Requested Information**

- 2) *If addressees conclude that full compliance with the TS in conjunction with Criteria IX, XI and XVI of 10 CFR Part 50, Appendix B, requires corrective actions, they should discuss their proposed corrective actions (e.g., changing inspection practices consistent with the NRC's position or submitting a TS amendment request with the associated safety basis for limiting the inspections) to achieve full compliance. If addressees choose to change their TS, the staff has included in the attachment suggested changes to the TS definitions for a tube inspection and for plugging limits to show what may be acceptable to the staff in cases where the tubes are expanded for the full depth of the tubesheet and where the extent of the inspection in the tubesheet region is limited.*

### **NMC Response**

Steam Generator tube inspections performed at Kewaunee Nuclear Power Plant are consistent with the NRC's position regarding tube inspections. Therefore this question does not apply.

### **NRC Requested Information**

- 3) *For plants where SG tube inspections have not been or are not being performed consistent with the NRC's position on the requirements in the TS in conjunction with Criteria IX, XI, and XVI of 10 CFR Part 50, Appendix B, the licensee should submit a safety assessment (i.e., a justification for continued operation based on maintaining tube structural and leakage integrity) that addresses any differences between the licensee's inspection practices and those called for by the NRC's position. Safety assessments should be submitted for all areas of the tube required to be inspected by the TS where flaws have the potential to exist and inspection techniques capable of detecting these flaws are not being used, and should include the basis for not employing such inspection techniques. The assessment should include an evaluation of (1) whether the inspection practices rely on an acceptance standard (e.g., cracks located at least a minimum distance of x below the top of the tube sheet, even if these cracks cause complete severance of the tube) which is different from the TS acceptance standards (i.e., the tube plugging limits or repair criteria), and (2) whether the safety assessment constitutes a change to the "method of evaluation" (as defined in 10 CFR 50.59) for establishing the structural and leakage integrity of the joint. If the safety assessment constitutes a change to the method of evaluation under 10 CFR 50.59, the licensee should determine whether a license amendment is necessary pursuant to that regulation.*

**NMC Response**

Steam Generator tube inspections performed at Kewaunee Nuclear Power Plant are consistent with the NRC's position regarding tube inspections. Therefore this question does not apply.