

E2-13
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Sensitive Allegation Material

ALLEGATION ACTION PLAN

AMS NO. RIII-2004-A-0067

Licensee: Point Beach
Docket/License No: 050-00266/301
Assigned Division/Branch: RPB 7

Allegation Review Board Membership:

Caniano/ Kryk/ Berson/ Heller/ Louden/ Lara / Caldwell and Grant for portions of the call
by phone Marsh/ Batemen/ & others

GENERIC CONCERNS: If Yes Explain: _____

DISCUSSION OF SAFETY SIGNIFICANCE: No immediate threat to public health safety. However since the concerned applied to an ongoing activity an emergency arb was required to conclude that it was acceptable to forward the issue to the licensee.

OI ACCEPTANCE: YES NO (Priority: HIGH NORMAL LOW)

Basis for OI Priority: _____

OI has Accepted Concern(s) No(s). _____ Signature _____

ARB MINUTES PROVIDED TO: Caldwell/Berson/Louden/Hills / PAUL

ACKNOWLEDGMENT LETTER: PRINT IN FINAL X REVISE _____ N/A _____

REFERRAL LETTER: A. Licensee YES X NO _____
B. State of YES _____ NO X
C. DOE YES _____ NO X

date received	5/21/04	due date of 1 st ARB	June 20, 2004
due date of ACK Ltr	June 20, 2004	date -90 days old	August 19, 2004
date -120 days old	September 18, 2004	date -150 day old	October 18, 2004
date -180 days old	November 17, 2004	date -365 days old	May 21, 2005
projected date for the 5 yr statue of limitation			May 20, 2009

COMMENTS:

Heller called the CI and left a message on the CI answering machine. The message informed the CI that since this was an ongoing concern that it will be referred to the licensee. I told the CI that we would not release the name of the CI to the licensee

[Signature]
Allegation Review Board Chairman

5/30/04
Date

ARB HAD on 5/21 with minutes retyped by J in Heller on 5/24/04
DK Heller
5/24

71-28

h

Concern No. 1:

An individual is concerned that the UT examination was not capable of finding the damage discovered within the penetration 26 "J" groove weld, and that primary water stress corrosion cracking (PWSCC) damage probably exists in other penetration "J" groove welds in the Unit 1 reactor pressure vessel head. The individual believes that the licensee will not pursue the PT examinations of other "J" groove weld in view of the potential for finding additional evidence of PWSCC damage.

The individual stated that "UT" examinations revealed an anomaly in the root of the penetration 26 "J" groove weld. The anomaly was believed to be manufacturing related. The presence of the indication lead to the performance of a surface PT examination of the penetration 26 "J" groove weld. The PT examination revealed numerous crack like surface indications. Follow up grinding and re-examination revealed that the indications had depth and deemed to be not acceptable for continued operation.

Regulatory Basis: overtime guidelines

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. **Send to Licensee Requesting Response in 3 Days.**
- B. Priority RIII Follow up and Closure Memo to OAC
- C. Follow up During Routine Inspection Within Days and Closure Memo to OAC
- D. Refer to OI. Recommended Priority: HIGH NORMAL LOW
Recommended Basis:
- E. Outside NRC's Jurisdiction. Describe Basis Below.
- F. Too General for Follow-up. Describe Basis Below.
- 1. Other (Specify) -

Responsible for Action - _____

In the referral letter ask the licensee to provide its (A) technical basis for not conducting additional PT examinations on other penetrations; and (B) characterization of previously identified J groove weld cracks as to whether or not a significant condition adverse to quality exists.

Additional information

1. NRR (Marsh) agreed to ensure that Chairman Nils J. Diaz would be informed of this issue since the letter was cc'd to Chairman Diaz
2. NRR (Marsh) agreed to provide technical support to the region.
3. RIII (Heller) agreed to inform RIII (Lickus) that the e-mail was provided to member of congress.
4. RIII (Heller) pursued transferring the issue to NRR since this is an NRR issue order and any defense of the order would come from NRR; No agreement was reached
5. Heller will pursue ownership of the allegation with Cwalinia on May 24, 2004

*referral
LTR sent
5/21
response RIII
5/24*

*me by 3/24
RH
5/24/04*

*EMAIL sent
5/24 & 5/21*

*Cwalinia
accepted RA
5/24/04*

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- 6. NRR staffers restated the position they had provided to RIII in several previous phone calls when a Region III inspector (Holmberg) raised essentially the same concern. Basically it was NRR's position that the code does not drive the licensee to expand the sample size since the inspection was based on an order and not a code required inspection.
- 7. Heller to call the CI and informed the CI that we will refer the issue to the licensee and that we will not release the CI's name to the licensee as the source of the concern

*one 5/21/04
message left on answering machine
OK'd 5/21/04*

✓ From: xxx
 To: <allegation@nrc.gov>
 Date: 5/21/04 8:56AM
 Subject: Point Beach Nuclear Plant

release

May 21, 2004

To: Nuclear Regulatory Commission

In view of the NRC's lack of performance in dealing with safety issues (as identified in the recent GAO assessment), such as the Davis Besse RPV head degradation, and lack of assertiveness in ensuring that PBNP operates without recurring safety significant events, I am compelled to communicate this issue.

I wish to express a safety concern about the operation of the Point Beach Nuclear Plant.

NRC Bulletin 2001-01 was issued when circumferential cracks were discovered in the Alloy 600 CRDM head penetration nozzles and in the Alloy 182 J-groove welds at several PWRs. Also, as a result of the severe head corrosion discovered at the Davis-Besse Nuclear Power Station, the NRC issued Bulletin 2002-02, which requested that PWRs determine if supplementary reactor vessel examinations are necessary. Finally, the NRC issued Order EA-03-009, which specified the frequency and type of reactor vessel head examinations that were necessary to ensure that plant operations do not pose undue risk to the public health and safety. To comply with NRC Order EA-03-009, PBNP performed bare metal visual inspections and "underhead" "UT" examinations of the vessel head penetration nozzles during the Unit 1 spring 2004 refueling outage.

The "UT" examinations revealed an anomaly in the root of the penetration 26 "J" groove weld. The anomaly was believed to be manufacturing related. The presence of the indication lead to the performance of a surface penetrant (PT) examination of the penetration 26 "J" groove weld. The "PT" examination was not required by NRC Order EA-03-009. The "PT" examination revealed numerous crack like surface indications. Follow up grinding and re-examination revealed the indications had depth. The indications were not sized or characterized. The indications were deemed to be not

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acceptable for continued operation. The indications were not detectable with the UT exam that was performed to comply with NRC Order EA-03-009.

Although not identical to other industry experience, the indications are likely PWSCC of the Inconel weld material.

Since the surface PT examination was not required by NRC Order EA-03-009, the NMC is not performing additional PT examinations of any of the other RPV head penetrations.

The NMC will obviously not pursue the PT examinations in view of the potential for finding additional evidence of PWSCC damage.

My concern is that the UT examination was not capable of finding the damaged discovered within the penetration 26 "J" groove weld, and that PWSCC damage probably exists in other penetration "J" groove welds in the PBNP Unit 1 RPV head.

In the interest of public safety, please provide technical justification why the NRC has not required PBNP to "PT" a reasonable sample of the other high stress penetration's "J" groove welds (outer periphery penetrations, and the mechanically straightened penetrations during manufacture of the subject head). Please provide your response in writing, and include the technical justification for ignoring the potential for Inconel 182 cracking that was not detectable by the mandated examinations.

Your prompt attention to this issue would be appreciated since the NMC is planning on installing the degraded RPV head and returning PBNP Unit 1 to service in the immediate future.

Sincerely

XXXXXXXXXXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXXXXXXXXXX

- cc: Chairman Nils J. Diaz
- Representative Thomas E. Petri
- Senator Herb Kohl
- Senator Russell Feingold

