

*- RIT*  
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From: Melvin Holmberg  
To: Hills, David  
Date: 6/3/04 4:24PM  
Subject: Point Beach VAFs

David, attached are the two VAFs from my Point Beach inspection for your review and approval.

CC: Billik, Tom; Carla Roque-Cruz

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 5  
FOIA/PA-2004-0282

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**Mail Envelope Properties (40BF9709.AB0 : 16 : 24412)**

**Subject:** Point Beach VAFs  
**Creation Date:** 6/3/04 4:24PM  
**From:** Melvin Holmberg

**Created By:** MSH@nrc.gov

**Recipients**

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 CPR1 CC (Carla Roque-Cruz)

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 DEH (David Hills)  
 TXB CC (Tom Bilik )

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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
PointBeachU1VAFHD.wpd	13541	06/03/04 04:19PM
PointBeachU1VAFISI.wpd	14369	06/03/04 03:58PM
MESSAGE	538	06/03/04 04:24PM

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

# RIV VALUE ADDED FINDING

VAF NUMBER:  
2004-XX

SITE:  
Point Beach

RPT NUMBER: 50-  
266/04-03

ISSUE DATE

## Unit 1 Reactor Vessel Head Examination and Repair Program Weaknesses

### No Plan To Confirm The Adequacy Of The Reactor Vessel Head Visual Head Examination Scope

On April 9, 2004, while performing the temporary instruction (TI) 150 for the Unit 1 reactor vessel head examinations, the inspectors identified that the licensee had not determined if the visual examination scope planned would meet NRC Order EA 03-009 requirements.

NRC order EA-03-009 dated February 20, 2004, required the licensee to complete a 95 percent surface area examination of the upper vessel head including areas upslope and downslope of the service structure. The service structure and vertical insulation panels represented areas where the vessel head surface was not examined. The inspectors identified that the licensee had not determined the percentage of uninspected coverage that these areas represent in advance of the visual examination. The inspectors' questions prompted the licensee to document in CAP 056522, the need to develop a calculation to estimate the area of visual examination coverage in a formal calculation. The licensee subsequently decided to document coverage in an internal memorandum dated May 17, 2004. In this memorandum, the licensee determined through review of drawings related to the head, head service structure and insulation package, that the total head area not available for visual examination was 1.5 percent. The inspectors' questions as to how this number was calculated prompted the licensee to issue a new memorandum dated May 24, 2004, which documented the square inches of surface areas obstructed. In this memorandum, the licensee changed the total obstructed area to 5 percent and concluded that the visual examinations would still be able to achieve the 95 percent coverage required by the Order.

### Supplemental Code Relief Needed To Justify Lack of Code Dye Penetrant (PT) Examination

On May 13, 2004, while performing TI 150 for the Unit 1 reactor vessel head examinations,

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Lack of Tracking System for Code Relief Requests in the ISI Program - On April 23, 2004, while performing the baseline inservice inspection (ISI) (IP 7111108), the inspectors identified that the licensee did not have a formal process for tracking deviations from the ASME Code that required NRC approval through the relief request process.

10 CFR 50.55a, requires that when the licensee determines that examinations required by the ASME Code are impractical, the licensee shall submit to the NRC their basis to support that determination by no later than 12 months after the end of the Code Interval (10 years). The inspectors identified that the licensee did not have a formal tracking system to identify weld examinations which could not be completed to the extent required by the ASME Code and that the licensee considered impractical to meet the Code requirements. Specifically, the inspectors identified reactor coolant system and safety injection weld examinations which were completed without achieving the Code required extent of volumetric coverage (e.g. limited examinations). The licensee staff reportedly intended to submit these limited examination which were completed in 2001 and 2002 to the NRC before the end of the Current Code period. However, the inspectors identified that no formal tracking mechanism existed to ensure that this action would occur. Further, the failure to submit a written relief request to the NRC within 6 months of identification was contrary to the licensee's Program document SEM 7.11.1 Inservice Inspection Plans and Reports which stated that these type of relief requests "should" be submitted within six months of identification. The inspectors determined that this issue did not represent a violation of NRC requirements and was not considered a finding. However, this represented a substantive weakness in the licensee's Program to monitor degradation of the RCPB.

These issues illustrate the importance of evaluating implementation of the programs for monitoring the reactor coolant pressure boundary integrity to ensure possible program weaknesses or vulnerabilities are identified at an early stage to avoid more significant problems. As a result of the inspectors efforts, the licensee was able to more clearly focus on the process deficiencies that were the root cause for these issues. Contact M. Holmberg, Tom Bilik, Carla-Roque-Cruz with any questions or comments regarding these issues.

Distribution: J. Caldwell, G. Grant, J. Grobe, C. Pederson, DRPIII, DRSI, R. Blough, L. Pilisco, K. Brockman, T. Bergman