

June 6, 2006

Mr. David A. Christian
Senior Vice President and
Chief Nuclear Officer
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: KEWAUNEE POWER STATION - CORRECTION TO GRANTED RELIEF FROM THE REQUIREMENTS OF THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS BOILER AND PRESSURE VESSEL CODE THIRD INSERVICE INSPECTION INTERVAL, LIMITED VOLUMETRIC AND SURFACE EXAMINATION COVERAGE FOR INSERVICE INSPECTION PROGRAM WELDS (TAC NOS. MC7921 THROUGH MC7924, MC7926 THROUGH MC7933, MC7935 THROUGH MC7941, MC7943 THROUGH MC7953, MC7955 THROUGH MC7957 AND MC7961 THROUGH MC7966)

Dear Mr. Christian:

By letter dated May 18, 2006, the U.S. Nuclear Regulatory Commission granted relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (the code), Section XI, for Kewaunee Power Station (KPS) pursuant to 10 CFR 50.55a(g)(6)(i) for the third inservice inspection interval for Relief Request Nos. RR-G-7-25 through RR-G-7-28, RR-G-7-30 through RR-G-7-37, RR-G-7-39 through RR-G-7-45, RR-G-7-47 through RR-G-7-57, RR-G-7-59 through RR-G-7-61, and RR-G-7-65 through RR-G-7-70. The purpose of this letter is to correct the following errors in the associated safety evaluation (SE):

1. The reference to Figure IWB-2500-9 should have been Figure IWB-2500-10.
2. For Relief Request 34, the subject of the relief is a 10" weld rather than a 6" Weld.
3. Footnote 1 in Section 4.4, which stated, in part, " - licensee performs VT-2 examination for leakage each outage," should have stated, " - licensee performs a VT-3 examination for general mechanical and structural condition of the support during the inspection interval."
4. For Relief Request 59, the inspection limitation is a 1" elbow taper rather than a 6" elbow taper.

D. Christian

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The above corrections are minor in nature and do not change the conclusions that were the basis for the granting of the subject relief. A corrected copy of the SE is enclosed with the changes indicated by vertical, marginal, bars. We regret the inconvenience that the need for these corrections may have caused.

Sincerely,

/RA/

L. Raghavan, Chief
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosure:
Corrected Safety Evaluation

cc w/encls: See next page

D. Christian

-2-

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Enclosure:
Corrected Safety Evaluation

cc w/encls: See next page

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Kewaunee Power Station

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM INTERVAL
AMERICAN SOCIETY OF MECHANICAL ENGINEERS
BOILER AND PRESSURE VESSEL CODE RELIEF REQUESTS
DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
DOCKET NO. 50-305

1.0 INTRODUCTION

By letter dated June 23, 2005, as supplemented by letter dated March 29, 2006, Dominion Energy Kewaunee, Inc. (the licensee), submitted requests for relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (the code), Section XI. The portion of the application addressed herein includes Relief Request Nos. RR-G-7-25 through RR-G-7-28, RR-G-7-30 through RR-G-7-37, RR-G-7-39 through RR-G-7-45, RR-G-7-47 through RR-G-7-57, RR-G-7-59 through RR-G-7-61, and RR-G-7-65 through RR-G-7-70 regarding the Kewaunee Power Station (KPS) volumetric and surface examination coverage requirements for examination categories B-A, B-F, B-J, C-C, C-F-1, and C-F-2 for a portion of its third 10-year Interval Inservice Inspection (ISI) Program welds. This safety evaluation does not address those relief requests withdrawn in the March 29, 2006, supplement, and acknowledged in the U.S. Nuclear Regulatory Commission (NRC) letter dated April 3, 2006. The following relief requests were withdrawn: RR-G-7-5, though RR-G-7-7, RR-G-7-11, RR-G-7-17, through RR-G-7-19, RR-G-7-24, RR-G-7-29, RR-G-7-38, RR-G-7-46, RR-G-7-58, RR-G-7-62, RR-G-7-63, RR-G-7-72 and RR-G-7-73. The remaining relief requests associated with the application, as supplemented, will be addressed in a future Safety Evaluation.

2.0 REGULATORY REQUIREMENTS

The ISI of Code Class 1, Class 2, and Class 3 components is to be performed in accordance with Section XI of the ASME Code and applicable edition and addenda as required by Title 10 of the *Code of Federal Regulations* (10 CFR) 10 CFR 50.55a(g), except where specific relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(I). Title 10 CFR 50.55a(a)(3) states in part that alternatives to the requirements of paragraph (g) may be used,

ENCLOSURE

when authorized by the NRC, if the applicant demonstrates that: (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) will meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The ISI Code of record for KPS for the third 10-year ISI interval is the 1989 Edition of the ASME Code with no Addenda. The third 10-year ISI interval ended on June 16, 2005, through incorporation of a 1 year interval extension as allowed under IWA-2430(d).

3.0 EVALUATION

ASME Code Components For Which Relief is Requested

The following table lists the items covered by this submittal. Items are delineated by the component identification, component for which relief is requested, Code required examination coverage, examination category/item number, and the figure which shows the area of interest and the amount of coverage obtained due to the limitation.

Relief Request Number RR-G-7-	Limited Area/Weld I.D.Number	System /Component for Which Relief is Requested: Area or Weld to be Examined	Code Requirement for 100% Exam Coverage from which Relief is Requested Exam Category Item No. Figure Limitation Percentage Obtained
25	FDW-H170	Integrally welded attachment saddle weld	Exam Category C-C Item No. C3.20 Figure IWC-2500-5 0% Surface Coverage
26	SI-H17A	Integrally welded attachment	Exam Category C-C Item No.C3.20 Figure IWC-2500-5 99% Surface Coverage
27	RC-W3BC	Reactor Coolant Pipe Branch Connection Weld	Exam Category B-J Item No.B9.31 Figure IWB-2500-10 57.6% Volume Coverage
28	RC-W4BC	6" Reactor Coolant Pipe Branch Connection Weld	Exam Category B-J Item No.B9.31 Figure IWB-2500-10 35% Volume Coverage

Relief Request Number RR-G-7-	Limited Area/Weld I.D.Number	System /Component for Which Relief is Requested: Area or Weld to be Examined	Code Requirement for 100% Exam Coverage from which Relief is Requested Exam Category Item No. Figure Limitation Percentage Obtained
30	PR-W12	3" Pressurizer Relief Circumferential Weld	Exam Category B-J Item No. B9.21 Figure IWB-2500-8 26% Surface Coverage
31	PR-W1DM	Pressurizer 6" Nozzle to Safe End Butt Weld	Exam Category B-F Item No. B5.40 Figure IWB-2500-8 50% Volume Coverage
32	PR-W16DM	Pressurizer 6" Nozzle to Safe End Butt Weld	Exam Category B-F Item No. B5.40 Figure IWB-2500-8 50% Volume Coverage
33	PR-W26DM	Pressurizer 6" Nozzle to Safe End Butt Weld	Exam Category B-F Item No. B5.40 Figure IWB-2500-8 50% Volume Coverage
34	PR-W67DM	Pressurizer 10" Nozzle to Safe End Butt Weld	Exam Category B-F Item No. B5.40 Figure IWB-2500-8 70% Volume Coverage
35	SI-W120	12" Safety Injection Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 50% Volume Coverage
36	SI-W123	12" Safety Injection Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 50% Volume Coverage
37	SI-W13	6" Safety Injection Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 37.5% Volume Coverage
39	PR-W2	6" Pressurizer Relief Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 38.7% Volume Coverage
40	RHR-W33	8" Residual Heat Removal Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 37.5% Volume Coverage
41	SI-W108	6" Safety Injection Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 50% Volume Coverage

Relief Request Number RR-G-7-	Limited Area/Weld I.D.Number	System /Component for Which Relief is Requested: Area or Weld to be Examined	Code Requirement for 100% Exam Coverage from which Relief is Requested Exam Category Item No. Figure Limitation Percentage Obtained
42	SI-W67	12" Safety Injection Circumferential Weld	Exam Category B-J Item No.B9.11 Figure IWB-2500-8 70% Volume Coverage
43	PR-W17	6" Pressurizer Relief Circumferential Weld	Exam Category B-J Item No.B9.11 Figure IWB-2500-8 48.2% Volume Coverage
44	RC-W64	10" Pressurizer Surge Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 78.4% Volume Coverage
45	RHR-W10	8" Residual Heat Removal Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 27% Volume Coverage
47	RHR-W188	10" Residual Heat Removal Circumferential Weld	Exam Category C-F-1 Item No. C5.11 Figure IWC-2500-7 50.2% Volume Coverage
48	RHR-W414	10" Residual Heat Removal Circumferential Weld	Exam Category C-F-1 Item No. C5.11 Figure IWC-2500-7 41% Volume Coverage
49	SI-W234	3" Safety Injection Circumferential Weld	Exam Category C-F-1 Item No. C5.21 Figure IWC-2500-7 80% Volume Coverage
50	SI-W262	3" Safety Injection Circumferential Weld	Exam Category C-F-1 Item No. C5.21 Figure IWC-2500-7 80% Volume Coverage
51	SI-W249	3" Safety Injection Circumferential Weld	Exam Category C-F-1 Item No. C5.21 Figure IWC-2500-7 84.5% Volume Coverage
52	SI-W307	3" Safety Injection Circumferential Weld	Exam Category C-F-1 Item No. C5.21 Figure IWC-2500-7 52.5% Volume Coverage

Relief Request Number RR-G-7-	Limited Area/Weld I.D.Number	System /Component for Which Relief is Requested: Area or Weld to be Examined	Code Requirement for 100% Exam Coverage from which Relief is Requested Exam Category Item No. Figure Limitation Percentage Obtained
53	RHR-W48	10" Residual Heat Removal Circumferential Weld	Exam Category C-F-1 Item No. C5.13 Figure IWC-2500-7 93% Surface Coverage
54	MS-W3	30" Main Steam Circumferential Weld	Exam Category C-F-2 Item No.C5.51 Figure IWC-2500-7 63% Volume Coverage
55	PS-W3	3" Pressurizer Spray Circumferential Weld	Exam Category B-J Item No.B9.21 Figure IWB-2500-8 73% Surface Coverage
56	PS-W34	3" Pressurizer Spray Circumferential Weld	Exam Category B-J Item No.B9.21 Figure IWB-2500-8 63% Surface Coverage
57	PS-W10	3" Pressurizer Relief Circumferential Weld	Exam Category B-J Item No.B9.21 Figure IWB-2500-8 64% Surface Coverage
59	MS-W90L	32" Main Steam Longitudinal Weld	Exam Category C-F-2 Item No.C5.52 Figure IWC-2500-7 78% Volume Coverage
60	MS-W91L	32" Main Steam Longitudinal Weld	Exam Category C-F-2 Item No. C5.52 Figure IWC-2500-7 37% Volume Coverage
61	MS-W91L	32" Main Steam Longitudinal Weld	Exam Category C-F-2 Item No. C5.52 Figure IWC-2500-7 50% Surface Coverage
65	RC-W50BC	12" Reactor Coolant Pipe Branch Connection Weld	Exam Category B-J Item No. B9.31 Figure IWB-2500-10 47% Volume Coverage
66	SI-W75	12" Safety Injection Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 50% Volume Coverage
67	SI-W119	12" Safety Injection Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 50% Volume Coverage

Relief Request Number RR-G-7-	Limited Area/Weld I.D.Number	System /Component for Which Relief is Requested: Area or Weld to be Examined	Code Requirement for 100% Exam Coverage from which Relief is Requested Exam Category Item No. Figure Limitation Percentage Obtained
68	SI-W47	6" Safety Injection Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 50% Volume Coverage
69	RC-W29	6" Reactor Coolant Circumferential Weld	Exam Category B-J Item No. B9.11 Figure IWB-2500-8 50% Volume Coverage
70	RC-W19	27.5" I.D. Reactor Coolant Pipe Circumferential Weld	Exam Category B-J Item No .B9.11 Figure IWB-2500-8 46% Volume Coverage

4.0 EXAMINATION LIMITATIONS FOR COMPONENTS

4.1 Code Requirements for which Relief is Requested

The 1989 Edition of ASME Code, Section XI, Code Categories B-A, B-F, B-J, C-C, C-F-1, and C-F-2, Figures IWB- 2500-4, -7, -8, -10, and Figures IWC-2500-5, -7, require a volumetric examination, which includes 100 percent of the weld length, once during the 10 year interval. Code Category C-F-2, Figure IWC-2500-7, requires a surface examination, which includes 100 percent of the weld length, once during the 10 year interval.

4.2 Licensee's Proposed Alternative to Code

No alternative offered by the licensee.

4.3 Licensee's Basis for Relief

The licensee stated that the welds' design configuration is such that the examination coverages are limited by physical interferences or close proximity to other welds, which prevented scanning 100 percent of the required weld lengths or performing a surface examination 100 percent of the weld lengths. Pursuant to the requirements of 10 CFR 50.55a(g)(5)(iii), the licensee seeks relief from performing the 100 percent volumetric and surface examination requirements of the ASME Code. In order to gain access to these welds to obtain 100 percent coverage, a design modification would be necessary for the subject components, which the licensee considers impractical and would represent a significant burden. The licensee listed the approximate coverages that were obtained for the welds. No reportable indications were noted by the licensee.

4.4 Evaluation

The 1989 Edition of the ASME Code, Section XI, Table IWB-2500-1, Code Categories B-A, B-F, B-J, and Table IWC-2500-1, Code Categories C-C, C-F-1, and C-F-2, require a volumetric examination, which includes 100 percent of the weld length, once during the 10 year interval. The examination volume is defined in Figures IWB-2500-4, -7, -8, -10, IWC-2500-5, and -7. Code Category C-F-2, Figure IWC-2500-7, requires a surface examination, which includes 100 percent of the weld length, once during the 10 year interval.

The NRC staff review of the data submitted for the subject welds noted that obstructions to complete coverages were present as a result of the design of the components-specifically, the proximity of another weld(s) or component(s), which limited access to the welds requiring examination. The NRC staff's evaluation of the limitations is listed in the table below.

Relief Request Number RR-G-7-	Limited Area/Weld I.D.Number	System /Component for Which Relief is Requested: Area or Weld to be Examined	Description of Limitation	Recordable Indications (Yes/No)
25	FDW-H170	Integrally welded attachment saddle weld	Encapsulation pipe around weld	N/a ¹
26	SI-H17A	Integrally welded attachment	Welded name plate proximity	No
27	RC-W3BC	Reactor Coolant Pipe Branch Connection Weld	Reactor Coolant Pipe proximity	No
28	RC-W4BC	6" Reactor Coolant Pipe Branch Connection Weld	Reactor Coolant pipe proximity	No ²
30	PR-W 12	3" Pressurizer Relief Circumferential Weld	Whip restraint prevents access	No
31	PR-W 1DM	Pressurizer 6" Nozzle to Safe End Butt Weld	Nozzle OD taper prevents two sided scan	No
32	PR-W 16DM	Pressurizer 6" Nozzle to Safe End Butt Weld	Nozzle OD taper prevents two sided scan	No
33	PR-W 26DM	Pressurizer 6" Nozzle to Safe End Butt Weld	Nozzle OD taper prevents two-sided scan	No
34	PR-W 67DM	Pressurizer 10" Nozzle to Safe End Butt Weld	Nozzle configuration underneath Pressurizer	No
35	SI-W 120	12" Safety Injection Circumferential Weld	Valve to pipe configuration prevents access	No
36	SI-W 123	12" Safety Injection Circumferential Weld	Elbow to branch configuration prevents access	No

Relief Request Number RR-G-7-	Limited Area/Weld I.D.Number	System /Component for Which Relief is Requested: Area or Weld to be Examined	Description of Limitation	Recordable Indications (Yes/No)
37	SI-W13	6" Safety Injection Circumferential Weld	Valve to pipe configuration prevents two-sided scan	No

- 1) No surface examination coverage obtained - licensee performs a VT-3 examination for general mechanical and structural condition of the support during the inspection interval.
- 2) Surface examination performed on 100% of weld.

Relief Request Number RR-G-7-	Limited Area/Weld I.D.Number	System /Component for Which Relief is Requested: Area or Weld to be Examined	Description of Limitation	Recordable Indications (Yes/No)
39	PR-W2	6" Pressurizer Relief Circumferential Weld	Nozzle taper prevents two-sided examination	No
40	RHR-W33	8" Residual Heat Removal Circumferential Weld	Valve body taper prevents two-sided access	No
41	SI-W108	6" Safety Injection Circumferential Weld	Valve body prevents two-sided access	No
42	SI-W67	12" Safety Injection Circumferential Weld	O.D. taper of tee prevents two-sided access	No
43	PR-W17	6" Pressurizer Relief Circumferential Weld	Safe end-to-elbow configuration	No
44	RC-W64	10" Pressurizer Surge Circumferential Weld	Rigid restraint proximity limits weld access	No
45	RHR-W10	8" Residual Heat Removal Circumferential Weld	Valve configuration and drainline prevents surface/vol access	No
47	RHR-W188	10" Residual Heat Removal Circumferential Weld	Tee configuration prevents 100% access to weld	No
48	RHR-W414	10" Residual Heat Removal Circumferential Weld	Valve configuration and 2 3/4" line weldolets	No
49	SI-W234	3" Safety Injection Circumferential Weld	Elbow curvature prevents contact	No
50	SI-W262	3" Safety Injection Circumferential Weld	Elbow curvature prevents contact	No
51	SI-W249	3" Safety Injection Circumferential Weld	Tee configuration prevents access	No

Relief Request Number RR-G-7-	Limited Area/Weld I.D.Number	System /Component for Which Relief is Requested: Area or Weld to be Examined	Description of Limitation	Recordable Indications (Yes/No)
52	SI-W307	3" Safety Injection Circumferential Weld	Tee configuration limits access	No
53	RHR-W48	10" Residual Heat Removal Circumferential Weld	Box rigid restraints prevents access	No
54	MS-W3	30" Main Steam Circumferential Weld	Reducing elbow taper prevents two sided access	No
55	PS-W3	3" Pressurizer Spray Circumferential Weld	Branch connection proximity limits access to weld	No
56	PS-W34	3" Pressurizer Spray Circumferential Weld	Whip restraint proximity prevents access	No
57	PS-W10	3" Pressurizer Relief Circumferential Weld	Hanger support proximity prevents access	No
59	MS-W90L	32" Main Steam Longitudinal Weld	1" inch elbow taper configuration prevents access	No
60	MS-W91L	32" Main Steam Longitudinal Weld	1" inch vent line prevents access	No
61	MS-W91L	32" Main Steam Longitudinal Weld	1" inch vent line prevents access for surface examination	No
65	RC-W50BC	12" Reactor Coolant Pipe Branch Connection Weld	Branch connection configuration	No
66	SI-W75	12" Safety Injection Circumferential Weld	Valve to elbow configuration	No
67	SI-W119	12" Safety Injection Circumferential Weld	Elbow to valve configuration	No
68	SI-W47	6" Safety Injection Circumferential Weld	Pipe to valve configuration	No
69	RC-W29	6" Reactor Coolant Circumferential Weld	Pipe to nozzle configuration taper	No
70	RC-W19	27.5" I.D. Reactor Coolant Pipe Circumferential Weld	Pipe to pump configuration	No

The NRC staff has reviewed the information and drawings provided by the licensee in the application as supplemented, and concludes that access to obtain Code required volumetric and surface coverages would only be gained through redesign of the components, which would be impractical and which, for each weld represents a significant burden to the licensee.

As stated by the licensee in its supplemental letter dated March 29, 2006, there were no recordable indications identified with the amount of coverages obtained. The NRC staff concludes, from the information provided by the licensee, that the examination coverages obtained would have identified any pattern of degradation should one have developed, and that a change of component design would be necessary to obtain the increased coverages. Thus, because existing examination coverages have revealed no recordable indications the examination coverages obtained by the licensee provide reasonable assurance of the structural integrity of the welds.

4.5 Conclusion

Based on the above discussion, the NRC staff concludes that compliance with the ASME Code coverage requirements is impractical for the configurations identified in the subject relief requests. The NRC staff further concludes that the proposed inspections provide reasonable assurance of structural integrity. Therefore, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i) for the third ISI interval for Relief Request Nos. RR-G-7-25 through RR-G-7-28, RR-G-7-30 through RR-G-7-37, RR-G-7-39 through RR-G-7-45, RR-G-7-47 through RR-G-7-57, RR-G-7-59 through RR-G-7-61, and RR-G-7-65 through RR-G-7-70 for KPS. This grant of relief is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

All other ASME Code, Section XI requirements for which relief was not specifically requested and approved in this relief request remain applicable, including third party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: T. Steingass

Date: June 6, 2006