January 13, 2011

NRC 2011-0008
10 CFR 50.55a

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Point Beach Nuclear Plant, Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

10 CFR 50.55a Request, Relief Request RR-23
Residual Heat Removal Heat Exchanger - Nozzle Examination
Fourth Ten-Year Inservice Inspection Program Interval
Response to Request for Additional Information

References:
(1) NextEra Energy Point Beach, LLC letter to NRC, dated September 9, 2010, 10 CFR 50.55a, Relief Request RR-23, Residual Heat Removal Heat Exchanger – Nozzle Examination, Fourth Ten-Year Inservice Inspection Program Interval (ML102520357)
(2) NRC electronic mail to NextEra Energy Point Beach, LLC, dated November 4, 2010, Point Beach Nuclear Plants, Units 1 and 2 – Request for Additional Information re: Relief Request RR-23 (TAC Nos. ME4674 and ME4675) (ML103090678 and ML103090692)

NextEra Energy Point Beach, LLC (NextEra) submitted relief request, RR-23 (Reference 1) pursuant to 10 CFR 50.55a. The relief request proposed an alternative to the examination requirements specified in the American Society of Mechanical Engineers, Boiler and Pressure Vessel Code, Section XI, 1998 Edition through 2000 Addenda (ASME Code), for examinations conducted to the Class 2 Residual Heat Removal (RHR) heat exchanger nozzle-to-shell welds at Point Beach Nuclear Plant (PBNP), Units 1 and 2.

Via Reference (2), the NRC staff determined that additional information was required to enable the staff's continued review of the request. Enclosure 1 provides NextEra's response to the NRC staff's request for additional information.

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

Very truly yours,

NextEra Energy Point Beach, LLC

Larry Meyer
Site Vice President

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
PSCW
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ENCLOSURE 1

NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

10 CFR 50.55a REQUEST, RELIEF REQUEST RR-23
RESIDUAL HEAT REMOVAL HEAT EXCHANGER - NOZZLE EXAMINATION
FOURTH TEN-YEAR INSERVICE INSPECTION PROGRAM INTERVAL
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

The NRC determined that additional information is required to enable the staff's continued review of Point Beach Nuclear Plant's 10 CFR 50.55a Request, Relief Request RR-23 (Reference 1). The following information is provided by NextEra Energy Point Beach, LLC (NextEra) in response to the NRC staff's request.

Question 1

Have the welds for which relief is requested ever been examined by the ultrasonic testing method?

If you have examined the welds by the ultrasonic testing method, when were the examinations performed?

If you have not, how do you intend on complying with Note 2 to Table 1 in American Society of Mechanical Engineers (ASME) Code Case N-706-1, "Alternative Examination Requirements of Table IWB-2500-1 and Table IWC-2500-1 for PWR Stainless Steel Residual and Regenerative Heat Exchangers"?

NextEra Response

The welds for which relief is requested have not been examined by the ultrasonic testing method.

Point Beach Nuclear Plant (PBNP) does not meet the "ASME Code Case N-706-1, Table 1, Note 2," requirement for having previously performed at least one volumetric examination of the specified welds, and therefore, is not utilizing Code Case N-706-1.

Question 2

Provide information regarding all previous examinations (e.g., when the inspections were performed, the inspection method, etc.) performed on the subject components and the results of those examinations.

NextEra Response

First Interval

Unit 1 - No Inservice exams were conducted in the First Interval for the residual heat removal (RHR) heat exchanger (HX), as none were required. At this point in the history of Section XI, the scope was only the reactor coolant system, which would later become Class 1.

Unit 2 - No Inservice exams were conducted in the First Interval for the RHR HX, as none were required. At this point in the history of Section XI, the scope was only the reactor coolant system, which would later become Class 1.

Second Interval

For both units - No provisions were made in the Code tables for nozzles with reinforcing pads. A specific requirement for the telltale hole did not exist at that time. One RHR HX from each unit was opened and inspected. Relief was requested and granted to not perform UT from the ID (OD not being possible). Penetrant testing of the external welds and VT-2 of the telltale holes was granted as an alternative.

Unit 1 RHR Heat Exchanger

Category	Class	Item No.	Weld ID	Description	Examined	Results
C-A	2	C1.10	RHR-B-2	Shell to Flange	05/02/85	UT; non relevant / geometric / NRI
C-A	2	C1.20	RHR-B-1	Shell to Head	05/02/85	UT; non relevant / geometric / NRI
C-B	2	C2.20	RHR-A-N2	Shell to Nozzle	11/20/90	PT; NRI
C-B	2	C2.20	RHR-B-N1	Shell to Nozzle	05/06/85	VT-1; NRI
C-B	2	C2.20	RHR-B-N2	Shell to Nozzle	05/06/85	VT-1; NRI
C-H	2	C7.10	N/A	RHR HX / Telltale	02/09/84	VT-2; Vessel and telltale NRI
C-H	2	C7.10	N/A	RHR HX / Telltale	03/20/87	VT-2; Vessel and telltale NRI
C-H	2	C7.11	N/A	RHR HX / Telltale	04/27/90	VT-2; Vessel and telltale NRI

Unit 2 RHR Heat Exchanger

Category	Class	Item No.	Weld ID	Description	Examined	Results
C-A	2	C1.10	RHR-A-2	Shell to Flange	10/10/86	UT; geometric / NRI
C-A	2	C1.20	RHR-A-1	Shell to Head	10/10/86	UT; non-relevant / NRI
C-B	2	C2.20	RHR-A-N2	Shell to Nozzle	10/10/86	PT; minor rounded, acceptable
C-H	2	C7.10	N/A	RHR HX / Telltale	11/07/85	VT-2; Vessel and telltale NRI
C-H	2	C7.10	N/A	RHR HX / Telltale	10/11/88	VT-2; Vessel and telltale NRI
C-H	2	C7.11	N/A	RHR HX / Telltale	10/18/89	VT-2; Vessel and telltale NRI

Third Interval

In the Third Interval, the applicable Code requirement was Item C2.32, "Nozzle-to-Shell (or Head) Welds When Inside of Vessel is Accessible." The RHR HX(s) were not opened on either unit. Therefore, no inspections occurred.

Unit 1 RHR Heat Exchanger

Category	Class	Item No.	Weld ID	Description	Examined	Results
C-A	2	C1.10	RHR-B-2	Shell to Flange	03/07/95	UT; geometric / NRI
C-A	2	C1.20	RHR-B-1	Shell to Head	03/07/95	UT; geometric / NRI
C-B	2	C2.31	RHR-B-N3	Inlet Nozzle Reinforcing Plate Weld	05/24/02	PT; NRI after minor surface preparation
C-B	2	C2.31	RHR-B-N4	Outlet Nozzle Reinforcing Plate Weld	05/24/02	PT; NRI after minor surface preparation
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	03/29/93	VT-2; Vessel and telltale NRI
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	04/09/96	VT-2; Vessel and telltale NRI
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	10/17/99	VT-2; Vessel and telltale NRI

Unit 2 RHR Heat Exchanger

Category	Class	Item No.	Weld ID	Description	Examined	Results
C-A	2	C1.10	RHR-B-2	Shell to Flange	09/24/96	UT; geometric / NRI
C-A	2	C1.20	RHR-B-1	Shell to Head	09/27/96	UT; geometric / NRI
C-B	2	C2.31	RHR-B-N3	Inlet Nozzle Reinforcing Plate Weld	04/01/02	PT; NRI after 2 minor rounded indications cleaned with flapper wheel
C-B	2	C2.31	RHR-B-N4	Outlet Nozzle Reinforcing Plate Weld	04/08/02	PT; 2 minor rounded indications removed and 1 rounded indication reduced to acceptable with flapper wheel
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	09/27/95	VT-2; Vessel and telltale NRI
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	03/26/98	VT-2; Vessel and telltale NRI
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	04/14/02	VT-2; Vessel and telltale NRI

Fourth Interval

For the Fourth Interval, the Code requirement is Item C2.32, "Nozzle-to-Shell (Nozzle to Head or Nozzle to Nozzle) Welds When Inside of Vessel is Accessible." RHR HX(s) will be opened in the Fourth Interval and relief is desired from the requirement to perform volumetric examination from the inside of the vessel.

Unit 1 RHR Heat Exchanger

Category	Class	Item No.	Weld ID	Description	Examined	Results
C-A	2	C1.10	RHR-B-2	Shell to Flange	10/23/08	UT; geometric / NRI
C-A	2	C1.20	RHR-B-1	Shell to Head	10/23/08	UT; geometric / NRI
C-B	2	C2.31	RHR-B-N3	Inlet Nozzle Reinforcing Plate Weld	03/14/10	PT; NRI
C-B	2	C2.31	RHR-B-N4	Outlet Nozzle Reinforcing Plate Weld	03/14/10	PT; NRI
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	10/12/02	VT-2; Vessel and telltale NRI
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	09/25/05	VT-2; Vessel and telltale NRI
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	03/02/10	VT-2; Vessel and telltale NRI

Unit 2 RHR Heat Exchanger

Category	Class	Item No.	Weld ID	Description	Examined	Results
C-A	2	C1.10	RHR-B-2	Shell to Flange	U2R31 Spring 2011	N/A
C-A	2	C1.20	RHR-B-1	Shell to Head	U2R31 Spring 2011	N/A
C-B	2	C2.31	RHR-B-N3	Inlet Nozzle Reinforcing Plate Weld	U2R31 Spring 2011	N/A
C-B	2	C2.31	RHR-B-N4	Outlet Nozzle Reinforcing Plate Weld	U2R31 Spring 2011	N/A
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	04/03/05	VT-2; Vessel and telltale NRI
C-H C-B	2	C7.10 C2.33	N/A	RHR HX / Telltale	04/06/08	VT-2; Vessel and telltale NRI

Notes:

UT - Ultrasonic Testing
PT - Penetrant Testing
VT-2 - Visual Exam for Leakage
NRI - No Recordable Indications

References

(1) NextEra Energy Point Beach, LLC letter to NRC, dated September 9, 2010, 10 CFR 50.55a, Relief Request RR-23, Residual Heat Removal Heat Exchanger – Nozzle Examination, Fourth Ten-Year Inservice Inspection Program Interval (ML102520357).

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