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 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305
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 EISENHUT, D. G. Division of Licensing

SUBJECT: Modifies 830308 commitment re performance of surface exam on
 100% of weld over 40-yr period, per util request for relief
 from performing volumetric exams of reactor coolant pump
 welds. Sections of welds will be examined over 30-yr period.

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WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

July 19, 1983

Director, Office of Nuclear Reactor Regulation
Attention: Mr. D. G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Clarification of RCP Exam Relief Request

Reference 1 informed you of Wisconsin Public Service's request for relief from performing volumetric examinations of the Reactor Coolant Pump internal casing welds as required by Section XI, Table IWB-2500 of the ASME code.

As an alternate to the volumetric examination, we proposed to perform a surface examination on the external surface of the weld. The surface examination was to include 25% of the weld length per inspection interval (10 years), thereby examining the entire weld within the lifetime of the component (40 years).

During performance of the surface examination during our latest refueling outage, it became apparent that portions of the weld are inaccessible from the exterior due to the reactor coolant pump structural supports. There are three pump supports located such that approximately 24% of the weld length is inaccessible (see figure 1).

We still intend to comply with the commitments proposed in reference 1; however, it is necessary to revise the commitment concerning the performance of the surface exam on 100% of the weld over a 40-year period.

Due to the inaccessibility of portions of the weld because of the reactor coolant pump supports, we intend to examine the entire accessible portion of

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the weld over a 30-year period. A different section of the accessible weld will be examined during each 10-year interval, with a section being defined as the accessible area between two pump supports. Section A (Figure 1) was examined during our most recent refueling outage and sections B and C will be examined over the next two intervals. This inspection plan will provide for surface examination of 100% of the accessible weld over three 10-year intervals (30 years).

We feel this is justifiable since a significant portion of the weld will be examined each interval and the total length of accessible weld will be examined within the lifetime of the component.

This submittal is to be considered a modification of the commitment contained in our March 8, 1983 letter.

On a related topic, Item B1.1 of IWB-2600 of the code requires a volumetric examination of the reactor vessel shell welds in the core region. Due to schedular constraints on the 1984 outage and as allowed by IWA-2400 of the code, we intend to extend the inspection interval by one year and perform the reactor vessel examination during the 1985 refueling outage.

Very truly yours,

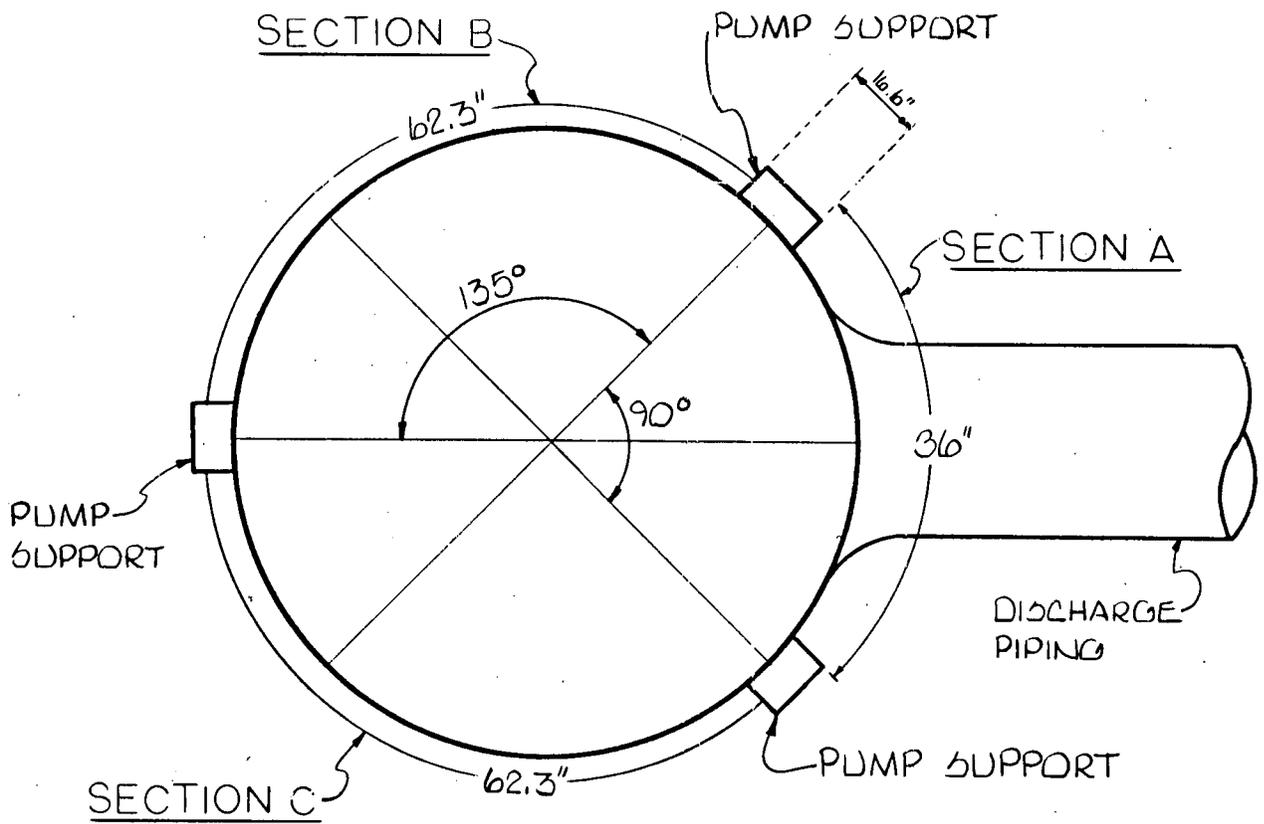


C. W. Giesler
Vice President - Nuclear Power

js

Attach.

cc - Mr. S. A. Varga, US NRC
Mr. Robert Nelson, US NRC



NOTE:
 DIMENSIONS ARE APPROXIMATED
 BASED ON MANUFACTURER DRAWINGS.

FIGURE 1