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 AUTH. NAME: AUTHOR AFFILIATION
 GIESLER, C.W. Wisconsin Public Service Corp.
 RECIP. NAME: RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Forwards addl relief request from requirement of Section XI
 of ASME Boiler & Pressure Vessel Code re hydrostatic
 pressure tests. Encl provide alternative method of exam.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

April 6, 1984

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
Hydrostatic Test Holding Time

Reference: 1) Letter from C. W. Giesler to D. G. Eisenhut dated February 8, 1984

In the reference letter we requested relief from several requirements of Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition and Addenda through the summer of 1975 Addenda, regarding hydrostatic pressure tests.

Following submittal of the referenced letter we identified an additional requirement for which relief is required. We ask that this additional relief request be reviewed with those submitted in our letter of February 8, 1984.

The appendix to this letter details the relief that is requested, the basis for the relief, and the proposed alternate method of examination.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. W. Giesler".

C. W. Giesler
Vice President - Nuclear Power

DSN:jks

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

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RADIATION SAFETY OFFICE U-97

THE UNIVERSITY OF CONNECTICUT
STORRS, CONNECTICUT 06268
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FOLLOWING ARE EXAMPLES OF RESEARCH PROJECTS UTILIZING RADIOACTIVE MATERIALS AT THE UNIVERSITY.

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CAPNOID SYNTHESIS AND FUNCTION

TRANSLATIONAL CONTROL MECHANISM

GENE EXPRESSION, VIRUS REPLICATION AND CELL GROWTH

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GANGLIONIC SYNAPTIC TRANSMISSION INSULIN AS A MEDIATOR OF MACRONUTRIENT INDUCED HYPERCALCAEMIA

FRACTIONATION, IDENTIFICATION AND CHARACTERIZATION OF COMPONENTS OF COLOSTRUM AND HUMAN MILK

GENETIC ASPECTS OF AMINO ACID TRANSPORT SYSTEMS

CNS ASPECTS OF MANGANESE TOXICITY

THE AORTA AND IMMUNOLOGICALLY INDUCED ATHEROSCLEROSIS

PROPERTIES OF CHEMICALLY MODIFIED PHOSPHOLIPASE A2

IN THIS SET OF GRANTS 9 MILLION DOLLARS USE RADIOISOTOPES

The following is a list of isotopes and the relative percentages of the total used at the University.

ISOTOPE	MILLICURIES	PERCENTAGE OF ORDERS
P-32	151.3	28
S-35	133.25	25
H-3	126.1	23
I-125	82.64	15
C-14	11.82	2
Ca-45	14.0	3
Cr-51	24.0	4
Mg-28	0.3	.05
Na-22	0.1	.01

If isotopes with half-lives less than 100 days were deregulated, the would take care of 72% of our radioactive materials.

APPENDIX

To The

Letter from C. W. Giesler to D. G. Eisenhower dated February 8, 1984

REQUEST FOR RELIEF

Components Affected

Class 2 and 3 systems and components which are noninsulated.

Section XI Requirement

Article 5210(a) of the 1974 edition of the ASME Boiler and Pressure Vessel Code requires that the hydrostatic test pressure and temperature shall be maintained for at least four (4) hours prior to the performance of the examinations.

Relief Requested

The hydrostatic test on noninsulated systems or components will be performed following a holding time of less than four (4) hours.

Basis For Relief

Article IWA-5213 of the 1980 Edition of the ASME Boiler and Pressure Vessel Code requires a four (4) hour holding time after attaining test pressure and temperature conditions for insulated systems. However for noninsulated systems the required holding time is ten (10) minutes.

It is evident from IWA-5240 of the 1974 Code and IWA-5242 of the 1980 Code that the requirement for a four hour hold time on insulated systems is based on the fact that this hold time would allow through wall leakage to migrate to a low point and become visible leakage as it seeps through the insulation. For uninsulated systems and components the ten (10) minute hold time is sufficient since through wall leakage can be readily identified and migration time through insulation need not be considered.

Alternate Method of Examination

The hydrostatic pressure tests will be performed using a four (4) hour holding time for insulated systems and components. For noninsulated systems or components a minimal ten (10) minute holding time will be used in accordance with Article IWA-5213(d) in Section XI of the 1980 Edition of the Code.