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EVERS,K.H. Wisconsin Public Service Corp.
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SUBJECT: Forwards Relief Request IST-RR-24 re inservice testing of listed valves during upcoming 1991 refueling outage scheduled to begin on 910308.

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600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

February 13, 1991

10 CFR 50.55a

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Inservice Testing Relief Request

Reference: 1) Letter from J. N. Hannon (NRC) to K. H. Evers (WPSC) dated September 13, 1990

10 CFR 50.55a(g)(4) requires that the inservice tests (IST) performed at the Kewaunee Nuclear Power Plant (KNPP) comply with Section XI of the ASME Boiler and Pressure Vessel Code, 1980 Edition including the Winter 1981 Addenda. Wisconsin Public Service Corporation (WPSC) has determined that certain IST requirements for ASME Code Class 1, 2, and 3 components are impractical and therefore requests relief. In accordance with 10 CFR 50.55a(g)(5)(iii), the description and basis for the relief, as well as an alternate method of testing, are included in the attachment to this letter.

As the attached relief request pertains to testing required to be performed during the upcoming KNPP refueling outage, your prompt review would be appreciated. The 1991 refueling outage is scheduled to begin March 8.

Sincerely,

K. H. Evers
Manager - Nuclear Power

SLC/jms
Attach.
cc - US NRC - Region III
Mr. Patrick Castleman, US NRC

A047
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Attachment

To

Letter from K. H. Evers (WPSC) to Document Control Desk (NRC)

Dated

February 13, 1991

Relief Request IST-RR-24

Components Affected

Valve #	Flow Design
SI-21A	X-K100-28
SI-21B	X-K100-28
SI-22A	X-K100-28
SI-22B	X-K100-28

Section XI Requirement

Article IWV-3522 requires that these check valves shall be exercised to the position required to fulfill their function at least once every 3 months unless such operation is not practical during plant operation. If only limited operation is practical during plant operation, the check valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdowns. Valves that cannot be exercised during plant operation shall be specifically identified by the owner and shall be full-stroke exercised during cold shutdowns.

On September 13, 1990, the NRC issued the Safety Evaluation (SE) of the Kewaunee Nuclear Power Plant (KNPP) Inservice Testing (IST) Program. Under the Evaluation section of the SE, the NRC granted relief (relief request RR-10) to partial flow test the accumulator check valves (SI-21A(B), SI-22A(B)). The NRC staff determined that the proposed partial flow test did not verify full operability but did provide sufficient information to establish reasonable assurance of operability. To supplement this test, the NRC imposed additional requirements to disassemble/inspect the valves each defueling outage.

Basis for Requesting Relief

WPSC defueled during the 1990 outage and disassembled/inspected each of the valves. They were found to be in good condition and operable. As a result of work planned for the 1991 refueling outage, the core will need to be unloaded again. The disassembly and inspection of these valves again after only one cycle of operation since the last inspection would provide limited useful information and is inconsistent with ALARA policies and practices. The average radiation dose received per valve from the 1990 inspections was approximately 790 mRem. In addition, the frequent disassembly of the valves may have detrimental effects on valve components. Since defueling is not a frequent activity in the industry, the staff clearly could not have envisioned an annual disassembly of these high exposure valves. Therefore, WPSC requests relief from performing disassembly and

Relief Request IST-RR-24 (Con't)

inspection of these valves during the 1991 refueling outage.

The next defueling outage is scheduled to take place in 1995 but may occur earlier if unforeseen work that requires core unload becomes necessary. Therefore, these valves could be disassembled and inspected within the next four years. The NRC will be advised if further relief is deemed necessary.

Alternate Method of Testing

Consistent with paragraph IWV-3522(b), these check valves will be partial flow exercised during the 1991 refueling outage in a manner that will demonstrate that the disc moves freely off its seat by comparison of pressure differential and flow rate.