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AUTH. NAME AUTHOR AFFILIATION
EVERS, K.H. Wisconsin Public Service Corp.
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SUBJECT: Discusses evaluation of facilities feasibility, albeit burdensome, to perform hydrostatic test which after review of NRC was suspended.

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TITLE: OR Submittal: Inservice Inspection/Testing/Relief from ASME Code

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WISCONSIN PUBLIC SERVICE CORPORATION

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

May 24, 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
Withdrawal of Hydrostatic Test Relief Requests

- References:
- 1) Letter from K. H. Evers (WPSC) to Document Control Desk (NRC) dated February 11, 1991
 - 2) Letter from K. H. Evers (WPSC) to Document Control Desk (NRC) dated March 11, 1991

10 CFR 50.55a(g)(4) requires that the inservice inspections (ISI) performed at the Kewaunee Nuclear Power Plant (KNPP) comply with Section XI of the ASME Boiler and Pressure Vessel Code, 1980 Edition including the 1981 Addenda. Wisconsin Public Service Corporation (WPSC) had determined that certain ISI requirements for ASME Code Class 3 components, as delineated in Reference 1, were impractical and therefore requested relief. The NRC's preliminary evaluation of Reference 1 determined that the relief requests did not adequately present a basis that demonstrated impracticality. In a March 7, 1991 teleconference between cognizant NRC and WPSC personnel it was agreed that additional information would be necessary to demonstrate ASME Section XI Code Requirements were impractical. The additional information was transmitted to the NRC in Reference 2 which superseded Reference 1.

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Upon further evaluation, WPSC determined it was feasible, albeit burdensome, to perform the hydrostatic tests. Immediately after making this determination the NRC Project Manager was notified and NRC review of the relief request was suspended. The sections of service water piping that were the subject of the relief request were successfully hydrostatically tested. Therefore, WPSC withdraws all requests for relief submitted in Reference 2.

Sincerely,



K. H. Evers
Manager - Nuclear Power

SLC/jms

cc - US NRC - Region III
Mr. Patrick Castleman, US NRC

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