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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: Application for amend to License DPR-43 requesting relief
 from performing exams of reactor coolant pump internal
 casing welds required by Section XI, Table IWB-2500 of ASME
 code.

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w/ check \$4,000

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WISCONSIN PUBLIC SERVICE CORPORATION

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

March 8, 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

Dear Mr. Eisenhut:

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

- References: 1. Letter from E. R. Mathews (WPS) to A. Schwencer (NRC)
dated May 1, 1981
2. Letter from W. G. Counsil (Conn Yankee) to D. M. Crutchfield
(NRC) dated September 3, 1982

Reference 1 informed you of Wisconsin Public Service's intent to follow the In-Service Inspection program presented in Proposed Amendment 25C to the Kewaunee Nuclear Power Plant Technical Specifications. The referenced letter specified that "Inservice inspection of ASME Code Class 1, Class 2 and Class 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code 1974 Edition and Addenda through Summer of 1975 as required by 10CFR50 Section 50.55a(g), except where such inspections are documented as impractical and specific relief has been requested by the NRC pursuant to 10CFR50 Section 50.55a(g)6(i)."

WPS hereby requests relief from performing the examinations of the Reactor Coolant Pump internal casing welds as required by Section XI, Table IWB-2500 of the ASME code. We feel the relief is justified based on the excessive cost of the examination, radiation exposure to personnel performing the examination, and the potential for damage to the pump during disassembly and reassembly. The ASME code requirements are as follows:

Category B-L-1 (Item #B5.6): Perform a volumetric examination of the

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reactor coolant pump casing weld. The exam shall include 100% of the pressure retaining welds in at least one pump in each group of pumps performing similar functions in the system. The examinations may be performed at or near the end of the inspection interval.

Category B-L-2 (Item #B5.6): Perform a visual examination of the internal pressure boundary surfaces of the pump. One pump in each group of pumps performing similar functions in the system shall be examined during each inspection interval. The examinations may be performed at or near the end of the inspection interval.

WPS contends that the physical and financial hardships that must be endured to perform the examinations are not technically justified for the following reasons:

- Visual and Radiographic examination of the pump internal surface will require complete disassembly of the pump. The pump manufacturer (Westinghouse) does not require or recommend pump disassembly to perform normal maintenance or inspections; therefore limited experience in this area may result in significant damage or degradation to the pump.
- There have been no reported failures of the casing weld with these model pumps. WPS has had no operational problems with the pump that could indicate potential degradation of the casing welds.
- The reactor coolant pump casing consists of two type 316 stainless steel cast rings. This type of material is widely used in the nuclear industry and has performed extremely well.
- The total radiation exposure at the Kewaunee Plant for ISI work in 1980 was 17.9 man-rem and in 1981 it was 15.9 man-rem. According to exposure levels experienced at other plants (reference 2), the total exposure for this reactor coolant pump exam could range from 35-100 man-rem. The RCP exam could potentially increase normal ISI exposure by more than 5 times.
- The pump disassembly inspection and reassembly is estimated to cost approximately \$500,000. WPS feels the increased radiation exposure and the excessive cost of performing this examination far exceed any beneficial safety improvements that might be achieved.

As an alternate to the B-L-1 and B-L-2 examinations, WPS will visually inspect the pump casing exterior during the hydrostatic pressure tests required by IWB-5000. In addition, WPS will perform a surface examination on the external surface of the weld.

The surface examination will include 25% of the weld length per inspection interval. WPS considers this justifiable, since we have only one pump with welds and it contains only one weld; therefore a statistically significant portion of the weld will be examined each interval and the total weld will be examined within the lifetime of the component.

Mr. D. G. Eisenhower
March 8, 1983
Page 3

If maintenance or operational problems are encountered which require disassembly of the pump internals, WPS will perform a visual inspection of the pump's interior surface and reevaluate the need and justification for performance of a volumetric examination.

Based on the above justification and pursuant to 10CFR50.55a(g)(6)(i), WPS requests relief from the Category B-L-1 and B-L-2 examinations of the Reactor Coolant pump casing. WPS has concluded that such relief will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon WPS that would result if the requirements were imposed.

WPS has determined this to be a Class III Amendment involving a single safety issue and does not involve a significant hazards consideration. Therefore, in accordance with 10CFR170.22, please find a check enclosed in the amount of \$4,000.

We would appreciate your prompt response to this relief request as any deviations from our proposed inspection plan will require extensive preparation and manpower planning for future outages.

Very truly yours,



C. W. Giesler
Vice President - Nuclear Power

js

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