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 HINTZ, D. C. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Submits inservice insp plan relief request re performance of
 volumetric exam of nozzle in Steam Generators 1A & 1B per
 ABME Code requirements. Requests review be completed by
 870401 so relief can be applied during refueling exams.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

January 27, 1987

10 CFR 50.55a(g)(5)(iii)

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 Inspection Plan Relief Request

Wisconsin Public Service Corporation hereby submits the attached relief request for the Inservice Inspection Program at the Kewaunee Nuclear Power Plant (KNPP). Pursuant to 10 CFR 50.55a(g)(5)(iii), we have provided as an attachment to this letter the information which supports our determination that conformance with the ASME Code requirements is impractical for our facility.

Please review the relief request as expeditiously as possible. The KNPP refueling outage, scheduled to begin March 1, 1987 and end by mid-April, is the third outage of the second ten-year interval (1984-1994). We request that your review be completed by April 1, 1987 so that we can determine whether the requested relief can apply to our refueling scheduled examinations.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. C. Hintz".

D. C. Hintz
Vice President - Nuclear Power

DSN/jms

Attach.

cc - Mr. Robert Nelson, US NRC
US NRC, Region III

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Relief Request No. RR-2-4

1. Components Affected

Steam Generators 1A and 1B

<u>Isometric</u>	<u>Description</u>
M-1206	Steam Generator 1A Main Steam Nozzle
M-1206	Steam Generator 1B Main Steam Nozzle
M-1206	Steam Generator 1A Feedwater Nozzle
M-1206	Steam Generator 1B Feedwater Nozzle

2. Section XI Requirements

Perform volumetric examination of the nozzle inside radius section per the 1980W1981 Edition of Section XI, Table IWC-2500-1, Category C-B, Item C2.22. As allowed by Note 4 on Table IWC-2500-1, Category C-B, the required examinations may be limited to one steam generator. Consequently, the extent of examination is limited to one feedwater nozzle and one main steam nozzle. These examinations shall be completed during successive inspection intervals in accordance with Table IWC-2412-1.

3. Basis for Requesting Relief

Relief is being sought from strict compliance with Table IWC-2412-1. Table IWC-2412-1 requires that a minimum of 16% of the required examinations be performed during the first inspection period with a maximum of 34% of the examinations to be credited to the first period. A minimum of 50% and a

maximum of 67% of the examinations must be completed by the end of the second inspection period, and the remainder completed by the end of the ten-year interval.

Since two nozzles are required to be examined, strict conformance to Table IWC-2412-1 would necessitate performing a volumetric exam on one-half of a nozzle during the first inspection period, completing the examination of the other half of the same nozzle during the second inspection period, and performing a full examination of the other nozzle during the third inspection period. The cumulative percentage of examinations for the two nozzles would then be 25% first period, 50% second period and 100% by end of interval, thereby meeting the cumulative percentages required by Table IWC-2412-1.

When only two examinations are required under an item number, it is unreasonable to require partial examination during both the first and second periods just to meet Table IWC-2412-1. Performance of a partial (i.e. half of a nozzle) examination requires the same preparation as the performance of a full nozzle exam. The manpower required for insulation removal, examination, and reinsulation is essentially the same whether one is examining half of a nozzle or a full nozzle. Performing examinations on a half of a nozzle during both the first and second period to be in strict conformance with Table IWC-2412-1 is not justified. The additional cost associated with performing the examination during both the first and second period and the additional radiation exposure received are not consistent with our practice of keeping radiation exposures as low as reasonably achievable (ALARA).

Alternative Method of Examination

Since two full nozzles need to be examined, WPSC will examine one full nozzle during either the first or second inspection period and the other nozzle will be examined during the third inspection period. This examination schedule ensures that both nozzles are fully examined by the end of the interval and also provides a distribution of the exams within the interval.

Examining one nozzle inside radius section during either the first or second period provides the flexibility to schedule the exams based on refueling outage activities and workloads. We will complete 50% of the required examinations by the end of the second inspection period and will complete the remainder of the examinations by the end of the inspection interval. This alternative meets the intent of distribution per Table IWC-2412-1 and does not introduce the additional manpower and ALARA concerns discussed above.