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SUBJECT: Requests relief from requirements of ASME Section XI,
Subsection IWE until 970909.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

June 9, 1997

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

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

Dear Sir/Madam:

Docket 50-305

Operating License DPR-43

Kewaunee Nuclear Power Plant

Request for Relief from the 1992 Edition with the 1992 Addenda of Subsection IWE of Section XI, Division 1, of the ASME Boiler and Pressure Vessel Code until September 9, 1997

- References:
- 1) Memorandum from Goutam Bagchi (NRC) to William B. Beckner (NRC), "Request For Exemption From Implementation of 10CFR50.55a Amendment Regarding Repair and Replacement Aspects of the Rule, Grand Gulf, Unit 1, TAC No. M96621" dated November 13, 1996.
 - 2) NRC Information Notice 97-29, "Containment Inspection Rule," dated May 30, 1997.

Pursuant to the provisions of 10CFR50.55a(a)(3)(I), Wisconsin Public Service Corporation is requesting relief from the requirements of ASME Section XI, Subsection IWE of the 1992 Edition and Addenda for repair and replacement activities of Class MC (metal containment) components and structures within the scope of the rule that may have to be performed prior to September 9, 1997.

Relief from compliance with the repair and replacement requirements of ASME Section XI, Subsection IWE for a period of one year from September 9, 1996 would provide a reasonable period of time for WPSC to review the Kewaunee Nuclear Power Plant's containment design and categorize specific containment structures and components that fall within the scope of IWE as well as to implement any programmatic and administrative controls required to meet the 1992 Edition and Addenda of Section XI, Subsection IWE. As an alternative during the proposed relief period, KNPP's current repair and replacement program, which is based on the 1989 Edition with no Addenda of the ASME Section XI, would serve as the implementing and recording document for any containment repair and replacement activities that could occur. The proposed alternative

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would provide an acceptable level of quality and safety by ensuring that containment structures and components following repair or replacement meet their original construction requirements with traceable documentation of the work performed.

Attachment 1 provides a detailed description of the basis for requesting relief and proposed alternatives to the Code requirements.

If you require additional information or have questions concerning this request, please contact a member of my staff.

Sincerely,



M. L. Marchi
Manager - Nuclear Business Group

ASR

Attach.

cc - US NRC, Region III
US NRC Senior Resident Inspector

ATTACHMENT 1

Letter from M. L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

June 9, 1997

SECTION XI CLASS MC RELIEF REQUEST

**Wisconsin Public Service Corporation
Request for Relief
ASME Section XI, Subsection IWE
for
Kewaunee Nuclear Power Plant**

Components: Components which fall under the scope of the 1992 Edition and Addenda of ASME Section XI, Subsection IWE. The components are primarily those pressure-retaining components associated with the steel containment vessel, any load-bearing components (e.g. supports) associated with the pressure-retaining function, and any integral attachments to the steel containment vessel. Piping systems that penetrate containment are covered by KNPP's current ASME Section XI repair and replacement program and are not included within the applicability of this request for relief.

ASME
Code Class: MC (or equivalent)

Code
Requirement: Implementation of the requirements of ASME Section XI, Subsection IWE, for repairs and replacements to containment structures, as defined in Articles IWE-4000, IWE-7000, paragraphs IWE-2500(b) and IWE-2600(b); and the post-repair and replacement requirements shown in Code paragraphs IWE-2200(d), (e), (f), (g); Articles IWF-4000 and IWF-7000; of the 1992 Edition with the 1992 Addenda of the ASME Boiler and Pressure Vessel Code, Section XI; and paragraph -2220 of ASME Code Case N-491; commencing on the effective date of the 10CFR50.55a rule change, September 9, 1996.

Basis for
Relief Request: This relief is requested on the basis that the proposed alternative, as described below, will provide an acceptable level of quality and safety for the interim period until the applicable specific programs and procedures can be written and issued for use. In addition, complete immediate implementation of the rule change for repair and replacement activities will require hasty and impractical actions which would result in hardships and/or difficulties without a compensating increase in the level of quality and safety above that provided by the programs KNPP currently uses to maintain the integrity of the containment structures and components.

Alternative
Requirements:

In an effort to comply with the stated NRC position that repair and replacement programs for metal containments must be implemented starting September 9, 1996, the following principles will be used during the interim period until the appropriately integrated programs, procedures, and personnel qualification requirements can be written, approved for use and issued for implementation.

Interim Program Principles

These principles are based on the fact that basic procedures for use in any repair or replacement activity, associated with containment components, are in place in the form of the original design, construction, and installation requirements and procedures and the application of these requirements through KNPP's Quality Assurance programs. Actual restoration of any containment component that needed repair would be required by the ASME Code to meet the original construction requirements as a minimum.

1. These guidelines shall be applied to the primary metal containment structures, Class MC, pressure retaining components and their associated supports, integral attachments, and appurtenances.
2. Interim repair and replacement activities shall be planned and implemented so as to provide for ANII review and involvement. As much as possible, these activities would follow the existing processes and procedures associated with the ANII oversight and to the extent outlined under these interim guidelines.
3. Containment repair and replacement activity documentation shall include the use of existing NIS-2 procedures and reports, with minor revisions to accommodate provisions of this request for relief.
4. Inspection activities and NDE procedures used following repair and replacement activities shall follow the requirements indicated in the original design, construction, and installation procedures.
5. In the case where specific preservice/baseline inspections (other than those addressed in item 4, above) are required by Subsection IWE, existing KNPP NDE inspection examination procedures shall be used to perform these containment structure examinations to the extent possible. Where specific and unique examination and acceptance criteria are required by the repair and replacement activity, existing NDE inspection techniques shall be employed in obtaining reasonable and practical examination results for evaluation. If the specific

Subsection IWE required examination(s) can be identified, and existing NDE procedures are fully qualified (in the judgement of KNPP's certified technical NDE Level III personnel) to perform the required examination; then the Subsection IWE required examination shall be performed and the results recorded. In this manner, the current NDE personnel qualifications and certifications would be sufficient for interim use until such time as final containment inspection programs and the accompanying NDE procedures are in place.

6. Containment structure pressure and leak rate testing shall follow the requirements established in conjunction with KNPP's 10CFR50 Appendix J program.
7. The work packages of the current refueling outage have been and shall continue to be reviewed for work which could contain activities that would fall within these interim guidelines. Emergent work and issues will have to be evaluated on a case-by-case basis as encountered, and the interim processes of this request for relief applied.
8. Applicable plant personnel shall be thoroughly informed of these interim program principles.

Justification:

KNPP is in the process of fully developing the necessary programs for implementation of the Subsection IWE rules. KNPP is working to have the necessary repair and replacement procedures in place by August 29, 1997. In addition, initial review of design drawings has been completed and walk-downs of these items for verification is underway. KNPP will start first period, first interval examinations for compliance to the new rule during the next outage, as currently scheduled in September 1998. The outage schedule may vary with unit operating conditions and circumstances.

As initial program examinations will not actually start for 18 months, the requirements to fully implement the new rules for repairs and replacements immediately commencing September 9, 1996 presents an undue impact to KNPP's current outage plans and schedules without a corresponding increase in quality or safety. In addition, implementation of the repair and replacement requirements commencing September 9, 1996 simultaneous to the rule change when the scope is not fully known could result in KNPP personnel omitting small specific components and details. The requirement to implement a fully developed containment repair and replacement program commencing simultaneously with the rule change would possibly delay current outage work activities until such time that the ISI and repair and replacement procedures could be written, approved and issued for use.

In some cases, this could delay much needed improvements which may affect overall plant reliability. Repair and replacement programs at KNPP are currently written to meet the requirements of the 1989 Edition of Section XI of the ASME Boiler and Pressure Vessel Code with specific requirements from other base codes of record as applicable to the unit's current inspection interval. This Code will remain the base Code of Record for containment repair and replacement programs during the proposed interim period.

In addition, any work that must be performed during the period between September 9, 1996 and the incorporation of the interim measures outlined above will have been performed in accordance with the existing KNPP QA program requirements. By virtue that such work would be performed in accordance with KNPP's current QA and ASME Section XI repair and replacement programs, such work would restore the associated containment structures to at least the minimum requirements of the original construction and installation standards. Accordingly, no further action with respect to the new requirements would be warranted. In addition, such work would be captured within the inservice inspection programs for future inspections, as required by the IWE containment ISI program under development.

In conclusion, the above proposed processes provide for the restoration of the containment structures following repairs and replacements to conditions that meet at least the original construction requirements and provide for traceable documentation of any applicable work performed. This interim process results in a level of quality and safety equivalent to that required by the ASME Code.