



February 15, 2012

NRC 2012-0011
10 CFR 50.55a

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

10 CFR 50.55a Request, Relief Requests RR-2 and RR-3
Fifth Ten-Year Inservice Inspection Program Interval

Pursuant to 10 CFR 50.55a, "Codes and Standards," Paragraph (a)(3)(i), this letter requests that the Nuclear Regulatory Commission (NRC) grant NextEra Energy Point Beach, LLC (NextEra), relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV Code), Section XI, 2007 Edition with 2008 Addenda for the Point Beach Nuclear Plant (PBNP) Units 1 and 2.

Specifically, relief is requested to use the reporting requirements contained within ASME Code Case N-532-5 in lieu of the Section XI required NIS-1, NIS-2, and Inservice Inspection (ISI) summary report. In addition, relief is requested to use the requirements contained within ASME Code Case N-775 in lieu of the requirements of IWA-5250(a)(2) regarding actions required when leakage is found at a bolted connection on a system borted for the purposes of controlling reactivity. Relief is requested on the basis that alternative methods will provide an acceptable level of quality and safety.

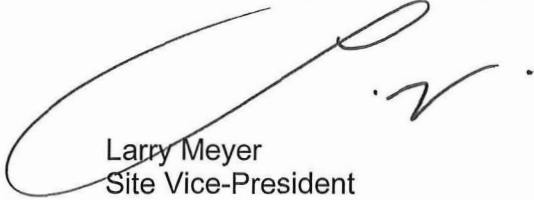
Enclosures 1 and 2 contain the 10 CFR 50.55a requests (Relief Requests RR-2 and RR-3). NextEra requests approval of these requests by November 1, 2012. The Unit 2 Refueling 32 (U2R32) is scheduled for November 2012. The requested duration of these relief requests is for the Fifth Ten-Year Inservice Inspection Program, which is scheduled to commence on August 1, 2012 and end on June 30, 2022, for both PBNP units.

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This submittal contains no new commitments or revisions to existing commitments.

Very truly yours,

NextEra Energy Point Beach, LLC

A handwritten signature in black ink, appearing to read 'Larry Meyer', is written over the typed name and title. The signature is fluid and cursive, with a large initial 'L' and a distinct 'M'.

Larry Meyer
Site Vice-President

Enclosures

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
PSCW
Mr. Mike Verhagan, Department of Commerce, State of Wisconsin

ENCLOSURE 1

RELIEF REQUEST RR-2

NEXTERA ENERGY POINT BEACH POINT BEACH NUCLEAR PLANT UNITS 1 & 2

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(a)(3)(i) WHICH PROVIDES AN ACCEPTABLE LEVEL OF QUALITY AND SAFETY

ALTERNATIVE FOR THE USE OF CODE CASE N-532-5

ASME Code Component(s) Affected

Code Class:	All
Component Numbers:	Not Applicable
Examination Category:	Not Applicable
Item Number(s):	Not Applicable
Description:	Alternative to ASME Section XI for the use of Code Case N-532-5

Applicable Code Edition and Addenda

The Point Beach Nuclear Plant (PBNP) will start the Fifth 10-year Inservice Inspection (ISI) Program Interval on August 1, 2012 and is required to follow the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," (ASME Section XI), 2007 Edition with the 2008 Addenda with the conditions of 10 CFR 50.55a.

Applicable Code Requirements

The 2007 Edition with the 2008 Addenda of ASME Section XI contains the following requirements concerning the use of Forms NIS-1 and NIS-2 and the inservice inspection summary report:

1. IWA-4331(d) requires Form NIS-2 to be completed for rerating, except for rerating component supports.
2. IWA-6210(c) requires a summary report to be prepared for preservice and inservice examination of Class 1 and 2 pressure retaining components and their supports.
3. IWA-6210(d) requires Form NIS-1 to be prepared for preservice and inservice examination of Class 1 and 2 pressure retaining components and their supports.
4. IWA-6210(e) requires Form NIS-2 to be prepared upon completion of all required activities associated with the Repair/Replacement Plan.

5. IWA-6210(f) requires signatures on Forms NIS-1 and NIS-2.
6. IWA-6220 provides the requirements in the preparation of the abstract for Form NIS-1. The abstract shall include the following items:
 - Component examined or tested
 - Code Class
 - Code Examination Category and Item Number
 - Examination or test method
 - Code Cases
 - Number and percentage of examinations completed when required by IWB-2411, IWC-2411, and IWF-2410
 - Reference to the abstracts of the conditions noted and the corrective actions recommended and taken for flaws detected during examinations or tests performed
7. IWA-6230(b) requires an inservice inspection summary report to be prepared following each refueling outage which shall include all examinations, tests, and repair/replacement activities conducted since the preceding summary report.
8. IWA-6230(c)(2) references Mandatory Appendix II for the Form NIS-1.
9. IWA-6230(c)(3) references Mandatory Appendix II for the Form NIS-2.
10. IWA-6230(d) specifies what the summary report cover sheet shall contain:
 - Date of document completion
 - Name and address of Owner
 - Name and address of plant
 - Name or number designation of the unit
 - Commercial service date for the unit
11. IWA-6240(b) requires the inservice inspection summary report to be submitted within 90 calendar days of the completion of each refueling outage.
12. IWA-6350(d) requires Form NIS-2 to be prepared as part of the repair/replacement activity records.
13. Mandatory Appendix II includes both Forms NIS-1 and NIS-2. Also included is the guide for completing both forms.
14. Mandatory Appendix IX, Article IX-1000(e) requires Form NIS-2 when welding is performed as part of the fabrication and installation of the mechanical clamping devices for Class 2 and 3 pressure boundary piping.

Reason for the Request

Code Case N-532-4 is included in Regulatory Guide 1.147, Revision 16 in Table 1. Table 1 lists code cases that are acceptable to the NRC for implementation in the ISI of light-water-cooled nuclear power plants. However, the code case is not applicable to the 2007 Edition with the 2008 Addenda of ASME Section XI. Code Case N-532-4 has applicability from the 1981 Edition with the Winter 1983 Addenda to the 2004 Edition with the 2005 Addenda. Therefore, Code Case N-532-4 does not meet the requirement contained in IWA-2441(b).

The applicability is limited to the 2005 Addenda because of Table 3 in the code case which lists the paragraph number cross reference for the use of the code case with earlier editions and addenda. This table only goes to the 2004 Edition with the 2005 Addenda.

Proposed Alternative and Basis for Use

Proposed Alternative:

PBNP requests the use of Code Case N-532-5 as permitted by 10 CFR50 55a(a)(3)(i).

Basis for Use:

Code Case N-532-4 has been published and approved by the NRC in Regulatory Guide 1.147 Rev. 16, however the applicability does not extend to the 2007 Edition with the 2008 Addenda. PBNP requests the use of Code Case N-532-5 as discussed above in lieu of whenever completion of Forms NIS-1 and NIS-2 or an inservice inspection summary report is required in ASME Section XI (2007 Edition with the 2008 Addenda). Code Case N-532-5 was published in Supplement 5 to the 2010 Edition of the Nuclear Code Case Book. The changes made between N-532-4 and N-532-5 are summarized below:

1. The scope of the code case was revised to allow the use of NIS-2A when the completion of Form NIS-2 is required in Section XI or other Section XI code cases (including rerating).
2. The use of Form NIS-2A is only completed after satisfying all Section XI requirements necessary to place the item in service and prior to inclusion in the Owner's Activity Report.
3. The Form NIS-2A is to be maintained as required by Section XI for the Form NIS-2.
4. Forms OAR-1 and NIS-2A were revised to specify those code cases that have been modified by Code Case N-532 and later revisions. This means if a code case was used for a repair/replacement activity and that code case required the completion of Form NIS-2, then that specific code case would be listed on Form NIS-2A.

Duration of Proposed Alternative

The proposed alternative will be used for the Fifth 10-Year Inservice Inspection Interval of the Inservice Inspection Program for PBNP that is scheduled to commence on August 1, 2012 and end on June 30, 2022 or until Code Case N-532-5 is approved by the NRC in Regulatory Guide 1.147. At this time, PBNP will use Code Case N-532-5 as approved by the NRC with any conditions identified.

Precedents

None

ENCLOSURE 2

RELIEF REQUEST RR-3

NEXTERA ENERGY POINT BEACH POINT BEACH NUCLEAR PLANT UNITS 1 & 2

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(a)(3)(i) WHICH PROVIDES AN ACCEPTABLE LEVEL OF QUALITY AND SAFETY

ALTERNATIVE TO THE REQUIREMENTS OF IWA-5250(a)(2)

ASME Code Component(s) Affected

Code Class: 1, 2, and 3
Component Numbers: N/A
Examination Category: B-P, C-H, and D-B.
Item Number(s): B15.10, B15.20, C7.10, D2.10
Description: Bolted Connections in Borated Systems

Applicable Code Edition and Addenda

The Point Beach Nuclear Plant (PBNP) will start the Fifth 10-year Inservice Inspection (ISI) Program Interval on August 1, 2012 and is required to follow the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," (ASME Section XI), 2007 Edition with the 2008 Addenda with the conditions of 10 CFR 50.55a.

Applicable Code Requirements

IWA-5250 "Corrective Action"

Leakage identified during the pressure tests performed in accordance with the subject Examination Categories is subject to corrective actions to meet the requirements of IWA-5250. IWA-5250(a)(2) indicates that if leakage occurs at bolted connections in a system borated for the purpose of controlling reactivity, one of the bolts shall be removed and VT-3 Examined and evaluated in accordance with IWA-3100. The bolt removed shall be the one closest to the source of leakage. If the removed bolt has evidence of degradation, all of the remaining bolting in the connection is required to be removed, VT-3 examined and evaluated in accordance with IWA-3100. As an alternative to IWA-5250(a)(2), IWA-5251 contains provisions for correcting the leak and performing an evaluation of joint integrity in lieu of removing the bolt for the VT-3 examination.

Reason for the Request

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested from the requirements of ASME Section XI, IWA-5250(a)(2), on the basis that the proposed alternative provides an acceptable level of quality and safety.

Proposed Alternative and Basis for Use

Proposed Alternative:

When a leak is identified at a bolted connection in systems borated for the purpose of controlling reactivity, PBNP proposes to either meet the requirements of IWA-5250(a)(2) or IWA-5251, or stop the leak, address the cause of the leak using PBNP's corrective action program, and replace all of the bolting at the connection in accordance with IWA-4000. A VT-3 of the removed bolting will not be performed as all bolting will be discarded and not reused.

Basis for Use:

ASME Section XI Code Case N-775 was approved by the ASME on June 24, 2010 and published in Supplement 2 of the Nuclear Code Case Book. This code case provides an alternative to IWA-5250(a)(2). The code case requires the following to be completed:

1. Corrective action shall be taken to stop the leak. The cause of the leakage shall be addressed in accordance with the Owner's corrective action program.
2. All pressure retaining bolting at the leaking connection shall be replaced in accordance with IWA-4000 (IWA-7000 in the 1989 Edition with the 1990 Addenda and earlier editions and addenda). VT-3 visual examination of the removed bolting is not required.

The fundamental purpose of performing the VT-3 of the bolt closest to the leak on systems borated for the purpose of controlling reactivity is to determine the condition of the remaining bolting which may affect the integrity of the connection. For those systems that are borated, if there is a leak the boric acid that forms on the pressure boundary material has been shown to corrode and cause degradation. If all of the bolts are replaced, the integrity of the connection is maintained and therefore provides an acceptable alternative.

Duration of Proposed Alternative

The proposed alternative will be used for the Fifth 10-Year Inservice Inspection Interval of the Inservice Inspection Program for PBNP that is scheduled to commence on August 1, 2012 and end on June 30, 2022 or until Code Case N-775 is approved by the NRC in Regulatory Guide 1.147. At this time, PBNP will use Code Case N-775 as approved by the NRC with any conditions identified.

Precedents

None