



May 14, 2015

NRC 2015-0025  
10 CFR 50.55a

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

Point Beach Nuclear Plant Unit 1  
Dockets 50-266  
Renewed License Nos. DPR-24

Relief Requests VR-01 Extension to Perform Inservice Testing of 1CC-00763B

Pursuant to 10 CFR 50.55a(z)(2), this letter requests that the Nuclear Regulatory Commission (NRC) grant NextEra Energy Point Beach, LLC (NextEra), relief on a one-time basis from the requirements of Section I-1350(a) of Mandatory Appendix I of the American Society of Mechanical Engineer's Operation and Maintenance (OM) Code, 2004 Edition through the 2006 Addenda. Relief is requested from performing inservice testing (IST) of relief valve 1CC-00763B as detailed in Relief Request VR-01 (Enclosure 1).

This relief request applies to Unit 1 of Point Beach Nuclear Plant (PBNP). Compliance with the OM Code would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety. The proposed alternative will not decrease the level of quality or safety of the relief valve until the end of refueling outage U1R36, currently scheduled to commence March 12, 2016. The requested duration of this relief request is 7 months.

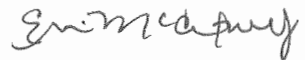
NextEra requests the NRC to review and approve the subject relief request on or before August 15, 2015. If necessary, NextEra personnel will be available to meet with your staff to discuss any concerns you may have.

This letter contains no new Regulatory Commitments or revisions to existing Regulatory Commitments.

If you have questions or require additional information, please contact Mr. Michael Millen, Licensing Manager, at 920/755-7845.

Very truly yours,

NextEra Energy Point Beach, LLC

A handwritten signature in cursive script, appearing to read "Eric McCartney".

Eric McCartney  
Site Vice-President

Enclosure

cc: Administrator, Region III, USNRC  
Project Manager, Point Beach Nuclear Plant, USNRC  
Resident Inspector, Point Beach Nuclear Plant, USNRC  
PSCW

## ENCLOSURE

### Inservice Testing Relief Request No. VR-01 Point Beach Unit 1 1B RCP Cooling Water Return Header Relief Valve Test

#### Proposed Alternative In Accordance with 10 CFR 50.55a(z)(2) Hardship or Unusual Difficulty Without Compensating Increase in Level of Quality or Safety

#### 1. ASME Code Components Affected

1B RCP Component Cooling Water Return Header Relief Valve (1CC-00763B)

This is a Class 2 relief valve located in the CCW return header from the RCP 1P-1B, between 1CC-00761B, RCP thermal barrier cooler outlet isolation valve and the containment penetration. Valve 1CC-00763B performs an ACTIVE safety function in the OPEN direction to provide overpressure protection for the low pressure CCW penetration piping and components.

#### 2. Applicable Code and Addenda

The Fifth Ten-Year Interval commenced on 09/01/2012 and 10/01/2012 for Point Beach Nuclear Plant Units 1 and Unit 2, respectively.

The Code of Record for the Point Beach Units 1 and 2, Fifth Ten-Year Interval Inservice Testing (IST) Program is the 2004 Edition through 2006 Addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code).

#### 3. Applicable Code Requirement

ASME OM Code Mandatory Appendix I Inservice Testing of Pressure Relief Devices in Light-Water Reactor Power Plants, Section I-1350 Test Frequency, Classes 2 and 3 Pressure Relief Valves.

I-1350(a) 10-year Test Interval, Classes 2 and 3 pressure relief valves, with the exception of PWR main steam safety valves, shall be tested every 10 years, starting with initial electric power generation. No maximum limit is specified for the number of valves to be tested during any single plant operating cycle; however, a minimum of 20% of the valves from each valve group shall be tested within any 48-month interval. This 20% shall consist of valves that have not been tested during the current 10 year test interval, if they exist. The test interval for any individual valve shall not exceed 10 years.

#### 4. Reason for Request

Relief valve 1CC-00763B, 1P-1B RCP Component Cooling Return Header Relief Valve testing was to occur in the Unit 1, Refueling Outage 35 (U1R35) in October of 2014. The valve is one of four valves in Group I-6 of the Point Beach Nuclear Plant Inservice Testing Program. The valve was inadvertently omitted from the refueling outage schedule. This omission is being reviewed in the corrective action program.

The omission was discovered on October 27, 2014. The Component Cooling Water System had already been filled and vented in preparation for start-up. Plant personnel had also identified that no spare parts were available to support testing. To align the Component Cooling Water System to support relief valve testing and perform testing without adequate spares would have placed Point Beach at a significant disadvantage.

1CC-00763B was last tested on September 12, 2005. The 10-year test interval will expire on September 12, 2015. The next scheduled opportunity for testing will be in Refueling Outage U1R36 which is scheduled to begin on March 12, 2016. A seven month extension beyond the 10-Year testing interval is requested to allow time for testing to be completed.

In accordance with 10 CFR 50.55a(a)(3)(ii), Point Beach requests relief from applicable ASME Code requirements for 1CC-00763B relief valve testing until the next Unit 1 refueling outage, U1R36. NUREG-1482, Rev 2, Section 2.5, Relief Request and Proposed Alternatives, states that a licensee may propose alternatives to ASME Code requirements if compliance with the specified requirement would result in hardship or unusual difficulty without compensating increase in level of quality and safety.

Performance of this testing would require the isolation of component cooling water to the 1P-1B RCP. This cannot be performed with the plant on-line. Performance of this testing would require the plant to incur additional thermal cycles and the stopping and starting of several major plant components which induces additional wear and risk unnecessarily.

**5. Proposed Alternative and Basis for Use**

There are four relief valves in this Group, two from each unit. There have been four test completed over the last 10 years of which one was slightly out of tolerance. The singular out of tolerance test result was a reading of one psi (0.6%) above the upper acceptance limit. The valve was refurbished for use. The remaining three tests were successfully completed.

Valve	As-Found Test	Results
1CC-00763B	10/18/2005	SAT, 144 and 144.2 psig
2CC-00763A	12/08/2009	SAT, 147.9 and 148.1 psig
2CC-00763B	4/14/2014	SAT, 149.1 psig
1CC-00763A	10/30/2014	UNSAT, 155.5 psig (0.6 % high)

A review of the performance data for the specific valve serial number (N78089-00-0003) was performed.

The valve was purchased and factory set at 145 psi on May 25, 1993 under PO 204881000 Rev 05. The valve was placed into service in October of 1993 at location 2CC-00763A under WO 935257. The valve was removed from service and tested in 1998 under WO 9809847. The setpoint failed low at 140 psig (0.65 psi or 0.45% low).

The valve was set at 150 psig per a design change and tested on April 26, 2002. The valve was installed in 2CC-00763B under WO 0205878. The valve was removed from service and tested in April of 2005 under WO 0415238. The setpoint failed high at 159.1 psig (4.6 psi or 3.06% high). The most recent as-left test was performed on September 9, 2005 under PO 0305004. The valve was installed in October of 2005 at

1CC-00763B. The 10 year test interval expires September 9, 2015, while the next Unit 1 Outage begins March 12, 2016.

The historical data review and the as found setpoint deviation does provide the objective evidence for determining the future quality and safety of the component cooling system. While the as found setpoint testing for this valve has not been consistent, the setpoint deviation is inconsequential with respect to challenging any system design criteria of the component cooling system. Thus the historical setpoint deviation is inconsequential with respect to the risk associated with additional thermal cycles, equipment cycles, and the induce wear associated with these cycles.

**6. Duration of Proposed Alternative**

Completion of the next Unit 1 refueling outage U1R36 ending approximately June 1, 2016.

**7. Precedents**

1. NRC Safety Evaluation dated October 29, 2001 (TAC No. MB2979) Donald C. Cook Nuclear Plant, Unit 2, Docket No. 50-316.
2. NRC Safety Evaluation dated April 1, 2004 (TAC No. MC2046), Point Beach Nuclear Plant, Unit Docket No. 50-266.
3. NRC Safety Evaluation dated March 5, 2009 (TAC No. ME0784), Salem Generating Station, Unit 2, Docket No, 50-311.