



**Wisconsin
Electric**
POWER COMPANY

Point Beach Nuclear Plant
6610 Nuclear Rd., Two Rivers, WI 54241

(414) 755-2321

PBL 94-0095

March 14, 1994

U. S. NUCLEAR REGULATORY COMMISSION
Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
ASME SECTION XI PRESSURE TEST PROGRAM
REQUESTS FOR RELIEF
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Enclosed is a revised request for relief associated with our Third Interval ASME Section XI Pressure Test Program, originally transmitted to you in our letter dated February 9, 1994 (PBL 94-0050).

Following telephone discussions between our engineering personnel and members of your staff on March 11, 1994, we have revised our request (PTP-3-03) to include 100 percent volumetric examination of welded joints associated with the repair as part of the proposed alternate requirement. We understand that the addition of this provision is necessary for the request to be granted unconditional relief.

As stated in our letter of February 9, 1994, we are currently planning modifications to our Main Feedwater System on both units to enable series check valves CS-00466 AA&BB and CS-00476 AA&BB to be leak tested independently. It is our intent to accomplish modifications to Unit 1 during our upcoming Spring 1994 refueling outage, and implement the alternate testing discussed in the enclosed request at that time. As a result, your prompt response to this request is greatly appreciated.

220058
9403240154 940314
PDR ADDOCK 05000266
P PDR

AD47

PBL 94-0095
March 14, 1994
Page 2

Should you have any questions or require any additional information regarding this matter, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. J. Maxfield".

G. J. Maxfield
Plant Manager

DEK/caw

Enclosure

RELIEF REQUEST PTP-3-03

COMPONENTS:

ASME Class 2 EB-9 Main Feedwater Piping (Units 1&2).
ASME Class 2 EB-10 Auxiliary Feedwater Piping (Units 1&2 and Common).

DRAWINGS:

M-202 Sh 2 (Unit 1)
M-2202 Sh 2 (Unit 2)
M-217 Sh 1 (Units 1&2 and Common)

ASME SECTION XI REQUIREMENT:

IWA-5214 REPAIRS AND REPLACEMENTS

- (a) A component repair or replacement shall be pressure tested prior to resumption of service if required by IWA-4400 and IWA-4600.
- (b) The test pressure and temperature for a system hydrostatic test subsequent to the component repair or replacement shall comply with the system test pressure and temperature specified in IWB-5222, IWC-5222, and IWD-5223, as applicable to the system which contains the repaired or replaced component.

IWC-5222 SYSTEM HYDROSTATIC TEST

- (a) The system hydrostatic test pressure shall be at least 1.10 times the system pressure P_{sv} for systems with Design Temperature of 200°F or less, and at least 1.25 times the system pressure P_{sv} for systems with Design Temperature above 200°F. The system pressure P_{sv} shall be the lowest pressure setting among the number of safety or relief valves provided for overpressure protection within the boundary of the system to be tested. For systems (or portions of systems) not provided with safety or relief valves, the system design pressure P_d shall be substituted for P_{sv} .

PROPOSED ALTERNATE REQUIREMENT:

- (a) A pressure test at nominal operating pressure shall be acceptable in lieu of the hydrostatic test of IWC-5222 following component repair or replacement within the ASME Class 2 Main Feedwater System boundary. A pressure test at nominal operating pressure shall be acceptable in lieu of the hydrostatic test of IWC-5222 following component repair or replacement within the ASME Class 2 Auxiliary Feedwater System boundary for those components which cannot be isolated from the steam generator.
- (b) Prior to performing VT-2 visual examination, the system shall be pressurized to nominal operating pressure for a minimum of 10 minutes. The system shall be maintained at nominal operating pressure during the performance of the VT-2 visual examination. The pressure retaining portions of the component which has undergone repair or replacement shall remain uninsulated until the VT-2 visual examination is completed.
- (c) In addition to the pressure test specified in (a) above, all pressure retaining welds which are part of the repair being performed shall be subjected to complete volumetric nondestructive examination. The method of examination and acceptance criteria shall be consistent with those utilized to meet periodic ASME Section XI (1986 Edition, no addenda) inservice inspection requirements.

BASIS FOR RELIEF:

Main Feedwater components and piping within the ASME Class 2 boundary are not isolable from the steam generator. The majority of Auxiliary Feedwater components and piping within the ASME Class 2 boundary, out to the first manual isolation valve which is located in the plant turbine building, are not isolable from the steam generator. Consequently, any hydrostatic test performed in accordance with IWC-5222 following component repair and replacement within the boundaries discussed above would also necessitate hydrostatically testing the associated steam generator, which is not practical.

ASME Code Case N-498 (approved by the Code Committee on May 13, 1991) already provides alternative rules for ASME Class 1 and 2 system 10-year hydrostatic tests, and allows these periodic tests to be conducted at nominal operating pressures vice the Code specified hydrostatic test pressures. The NRC staff approved the use of Code Case N-498 in Revision 9 of Regulatory Guide 1.147 (issued April 1992), as testing at nominal operating pressures for ASME Class 1 and 2 systems provides an acceptable level of quality and safety. Extending the use of the basic alternative rules promulgated in ASME Code Case N-498 to testing of ASME Class 2 components following repair or replacement logically follows, and also represents an acceptable level of quality and safety when utilized in conjunction with volumetric examination of welded joints.

STATUS:

Awaiting NRC Response. Request originally submitted to the NRC on February 9, 1994 (PBL 94-0050). Request revised to incorporate volumetric NDE as an additional proposed alternate requirement and resubmitted to the NRC in March of 1994.