



**Wisconsin  
Electric**  
POWER COMPANY

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PBL 94-0109

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U. S. NUCLEAR REGULATORY COMMISSION  
Document Control Desk  
Mail Station P1-137  
Washington, DC 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 request for relief associated with our Third Interval ASME Section XI Pressure Test Program.

Following telephone discussions on March 28, 1994, between our engineering personnel and members of your staff, we have prepared a specific request for upcoming modifications to our Main Feedwater System. These modifications are intended to enable series check valves CS-00466 AA&BB and CS-00476 AA&BB to be leak tested independently, and are scheduled to be accomplished during our upcoming Spring 1994 refueling outage on Unit 1, and during our Fall 1994 refueling outage on Unit 2.

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

Sincerely,

G. J. Maxfield  
Plant Manager

DEK/caw

Enclosure

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PDR ADOCK 05000266  
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## RELIEF REQUEST PTP-3-04

COMPONENTS: ASME Class 2 EB-9 Main Feedwater Piping (Units 1&2), associated with Point Beach Modifications 89-072 (Unit 1) and 89-073 (Unit 2).

DRAWINGS: M-202 Sh 2 (Unit 1)  
M-2202 Sh 2 (Unit 2)

### 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 modifications to the specified main feedwater piping.
- (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, a surface examination of the final weld pass shall be performed on all socket welds which are part of the modification. Surface examinations of the root weld pass and final weld pass shall be performed on all full penetration welds joining socket-weld pipets (see figure 1) to the 16 inch ASME Class 2 EB-9 main feedwater piping.

BASIS FOR RELIEF:

Modifications 89-072 (Unit 1) and 89-073 (Unit 2) install bypass assemblies around main feedwater series check valves CS-00466 AA&BB and CS-00476 AA&BB (4 valves per unit) to permit these components to be leak tested independently. Each check valve is provided with a 2 inch bypass assembly (see figure 2), which consists of 2 socket-weld pipets providing attachment to the 16 inch ASME Class 2 EB-9 main feedwater piping and approximately nine other 2 inch components connected at socket welded joints.

Main feedwater piping and components within the ASME Class 2 boundary are not isolable from their respective steam generators. A hydrostatic test performed in accordance with IWC-5222 following completion of the bypass assembly for any main feedwater check valve would also necessitate hydrostatically testing the associated steam generator, which is not practical. Use of volumetric NDE methods to examine the welds associated with the bypass assembly is also not practical because of either the size or joint type. Consequently, the pressure test and surface examinations outlined in the Proposed Alternate Requirement section above constitute the only practical alternative.

STATUS: Awaiting NRC Response.

FIGURE 1

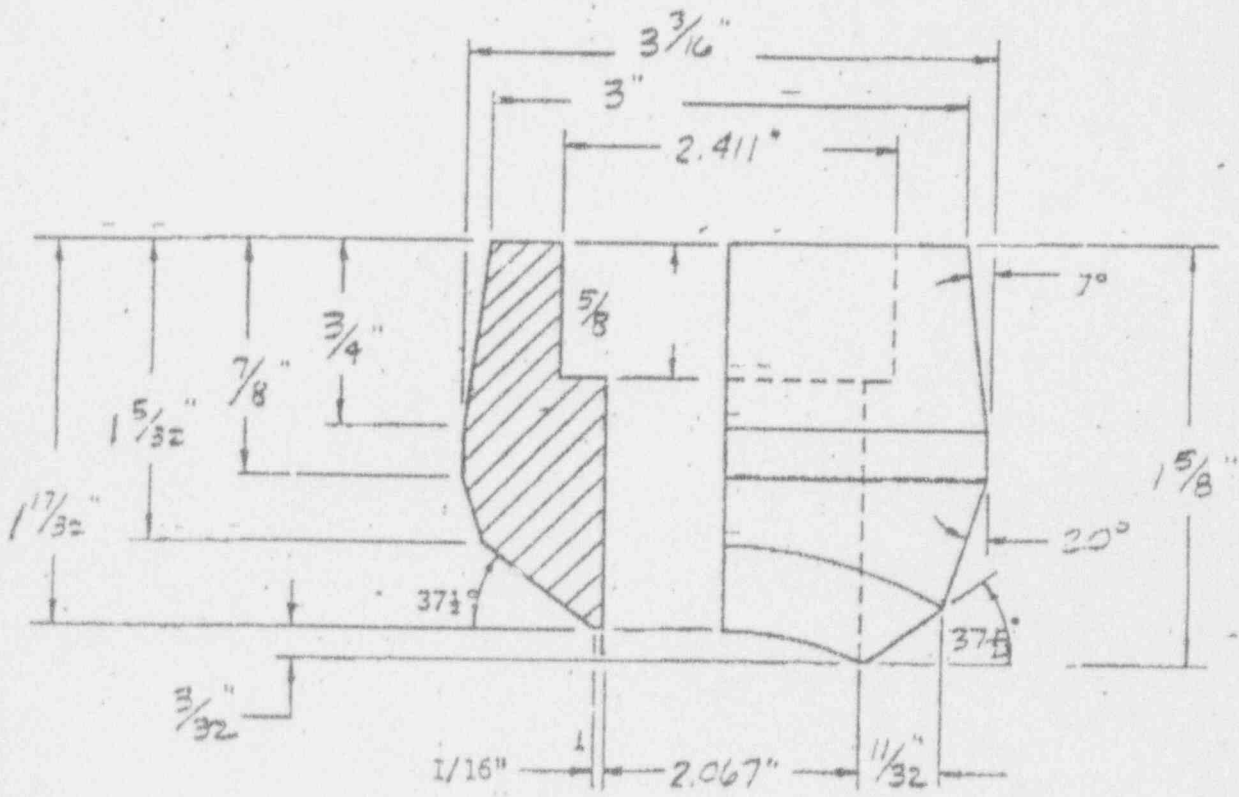


FIGURE 2

