July 19, 1994

Docket No. 50-301

Mr. Robert E. Link, Vice President
Nuclear Power Department
Wisconsin Electric Power Company
231 West Michigan Street, Room P379
Milwaukee, Wisconsin 53201

Dear Mr. Link:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON THE POINT BEACH NUCLEAR PLANT, UNIT 2, THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM PLAN AND ASSOCIATED REQUESTS FOR RELIEF (TAC NO. M88056)

While reviewing your February 10, 1993, submittal of the Point Beach Nuclear Plant, Unit 2, Third 10-Year Interval Inservice Inspection Program, the staff has determined that additional information is required to complete the review.

The staff requests that a response to the enclosed questions be provided within 60 days to meet the staff's inservice inspection program plan review schedule. In addition, to expedite the review process, please send a copy of the RAI response to NRC's contractor, INEL, at the following address:

Boyd W. Brown
EG&G Idaho, Inc.
INEL Research Center
2151 North Boulevard
PO Box 1625
Idaho Falls, Idaho 83415-2209

This request for information affects fewer than 10 respondents; therefore, OMB clearance is not required under Public Law 96-511.

Sincerely,

Original signed by
Allen G. Hansen, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Enclosure:
As stated
cc w/enclosure:
See next page

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OFFICIAL RECORD DOCUMENT NAME: G:\PTBEACH\PTB88056.RAI

cc:

Ernest L. Blake, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, DC 20037

Mr. Gregory J. Maxfield, Manager
Point Beach Nuclear Plant
Wisconsin Electric Power Company
6610 Nuclear Road
Two Rivers, Wisconsin 54241

Town Chairman
Town of Two Creeks
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Two Rivers, Wisconsin 54241

Chairman
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Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
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Lisle, Illinois 60532-4351

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
6612 Nuclear Road
Two Rivers, Wisconsin 54241

ENCLOSURE

WISCONSIN ELECTRIC COMPANY
POINT BEACH NUCLEAR PLANT, UNIT 2
DOCKET NUMBER 50-301

REQUEST FOR ADDITIONAL INFORMATION - THIRD 10-YEAR INTERVAL
INSERVICE INSPECTION PROGRAM PLAN, REVISION 0

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Class 1, Class 2, and Class 3, meet the requirements, except design and access provisions and preservice examination requirements, set forth in ASME Code Section XI, *Rules for Inservice Inspection of Nuclear Power Plant Components*, to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during successive 120-month inspection intervals comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the start of a successive 120-month interval, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b), subject to the limitations and modifications listed therein. The licensee, Wisconsin Electric Company, has prepared the *Point Beach Nuclear Plant, Unit 2, Third 10-Year Interval Inservice Inspection (ISI) Program Plan*, Revision 0, to meet the requirements of the 1986 Edition for all components except Class 1 piping. The extent of examination for Code Class 1 piping welds (Examination Category B-J) has been determined by the 1974 Edition through Summer 1975 Addenda (74S75) as permitted by 10 CFR 50.55a(2)(ii).

In the ISI Program Plan, you determined that certain Code examination requirements are impractical and requested relief. As required by 10 CFR 50.55a(g)(5), you submitted information to the Nuclear Regulatory Commission (NRC) to support that determination as part of the *Point Beach Nuclear Plant, Unit 2, Third 10-Year Interval Inservice Inspection (ISI) Program Plan*, Revision 0, submitted February 10, 1993. The staff has reviewed the available information in the ISI Program Plan, including the requests for relief from the ASME Code Section XI requirements that the licensee has determined to be impractical.

2. Additional Information Required

Based on the above review, the staff has concluded that the following information and/or clarification is required to complete the review of the ISI Program Plan:

A. Address the degree of compliance with augmented examinations that have been established by the NRC when added assurance of structural reliability is deemed necessary. Examples of documents that address augmented examinations based on licensee commitments are listed below.

(1) Branch Technical Position MEB 3-1, "High Energy Fluid Systems, Protection Against Postulated Piping Failures in Fluid Systems Outside Containment;" and

(2) Regulatory Guide 1.150, *Ultrasonic Testing of Reactor Vessel Welds During Preservice and Inservice Examinations.*

Discuss these and any other augmented examinations that may have been incorporated in the *Point Beach Nuclear Plant, Unit 2, Third 10-Year Interval Inservice Inspection (ISI) Program Plan*, Revision 0.

B. The Code of Federal Regulations, Part 10, 50.55a(g)(6)(ii)(A), requires that all licensees must augment their reactor vessel examinations by implementing once, during the inservice inspection interval in effect on September 8, 1992, the examination requirements for reactor vessel shell welds specified in Item B1.10 of Examination Category B-A of the 1989 Code. In addition, all previously granted relief for Item B1.10, Examination Category B-A, for the interval in effect on September 8, 1992, is revoked by the new regulation. For licensees with fewer than 40 months remaining in the interval on the effective date, deferral of the augmented examination is permissible with the conditions stated in the regulations.

Based on the effective date of the subject regulation and the December 1992 starting date of the third 10-year interval of the Point Beach Nuclear Plant, Unit 2, please provide the staff with the projected schedule for this augmented examination and a technical discussion describing how it will be implemented at Point Beach Nuclear Plant, Unit 2, during the third interval. Describe the intended approach and any specialized techniques or equipment that will be used to complete the required augmented examinations.

C. You have provided piping and instrumentation diagrams (P&IDs) for Code Class 1, Class 2, and Class 3 systems. Please provide isometric and component drawings that include examination area numbers and line numbers for all of the Code Class 1 and Class 2

piping welds, components, and supports. Please include a cross reference for the Inservice Examination Program line number to the P&ID line number. The requested isometric/component drawings, along with the itemized listing already provided, will permit the staff to review the extent to which ISI examinations meet the applicable Code requirements.

D. For Code Class 1 integral attachment welds to piping, pumps, and valves, the Code does not require examinations for the third and fourth interval when implementing Inspection Program B. Examination of integral attachments in Code Class 2 and 3 systems is required in the third and fourth interval. The recently approved ASME Code Case N-509 (approved November 25, 1992 by ASME), provides for continued inspection of Class 1 integral attachments for the life of the plant as well as readjustments in the sample inspection requirements for Code Class 2 and 3. Are you following the provisions of Code Case N-509? Describe your plans with respect to implementing this Code Case.

E. As permitted by 10 CFR 50.55a(2)(ii), you have elected to adopt the 74S75 Code to determine the extent of examinations for Code Class 1 piping (Examination Category B-J) in the third 10-year interval. The requirements for successive examinations for the third 10-year interval, however, must be in accordance with IWB-2420, "Successive Inspections," of the 1986 edition. It appears that you are implementing the successive examinations requirements of the 74S75 Code. Please provide a technical position for the continued implementation of the 74S75 scheduling philosophy.

F. Verify that there are no additional requests for relief required at this time. If additional relief requests are required, you should submit them for staff review.