

VPNPD-88-056 NRC-88-010

January 25, 1988

U.S. NUCLEAR REGULATORY COMMISSION Document Control Desk Washington, D.C. 20555

Gentlemen:

CKETS 50-266 AND 50-301 CLE SECTION XI, RELIEF REQUESTS OINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with 10 CFR 50.55 a(g)(5)(iii), Wisconsin Electric Power Company (licensee) requests inservice inspection relief for the second ten-year inspection interval for Point Beach Nuclear Plant, Units 1 and 2. Attachment 1 provides the supportive information for the relief request from the 1977/Summer, 1979 Edition/ Addenda of ASME Section XI code requirement to conduct a Category B-L-1 and B-L-2 examination on a Unit 1 reactor coolant pump casing. Attachment 2 provides the supportive information for the relief request from the same requirements for Unit 2. Attachments 3 and 4 provide drawings of the Point Beach reactor coolant pumps. Wisconsin Electric requests that the Commission review these relief requests and provide approval as required by the Commissior's regulations.

We understand that relief requests similar to the attached have been previously approved for numerous licensees including Point Beach Nuclear Plant, Unit 2. Therefore, we trust that your review and approval can be completed in a timely manner, but no later than September 1988. This will allow us sufficient planning time prior to the Spring 1989 Unit 1 refueling during which these examinations are scheduled. The Unit 2 examinations are currently scheduled for the Fall 1990 refueling outage.

Enclosed is a check in the amount of \$150 for the application fee required by 10 CFR Part 170.

Please contect us if any additional information is needed.

8802030345 880125 PDR ADOCK 05000266

Very truly yours,

C. W. Fay Vice President Nuclear Power

Attachments (Check 408999)

Copy to NRC Resident Inspector

(414) 277-2345

THOB999

A041

ATTACHMENT 1

UNIT 1 RELIEF REQUEST

Relief Request No.

Description

RR-1-13

Reactor Coolant Pump casing welds

Component

Reactor Coolant Pump

Exam Area

Class 1 Casing Welds

Isometric or Component Drawing

See Attachments 3 and 4.

ASME Section XI Category

B-L-1 B-L-2

ASME Section XI Item Number

B12.10 B12.20

ASME Section XI Examination Requirement

- B-L-1: "The examinations performed during each inspection interval shall include 100% of the pressure-retaining welds in at least one pump in each group of pumps performing similar functions in system (e.g. recirculating coolant pumps)." The exam method shall be volumetric.
- B-L-2: "One pump in each of the group of pumps performing similar functions in the system shall be (xamined during each inspection interval. This examination may be performed on the same pump selected for the category B-L-1 examination." The exam method shall be visual.

Alternative Examinition

A VT-2 examination of a casing exterior is performed in conjunction with the syst sakage test every outage and each system hydro test.

In addition, once ea .. interval, an exterior surface examination of approximately 1/3 of the accessible pump casing weld surface will be conducted in conjunction with a 100% exterior visual examination (VT-1).

If maintenance or operational problems are encountered which necessitate disassembly of the casing internals of either pump, a VT-3 examination of the interior casing surface will be performed.

Reason for Relief Request

The two reactor coolant pumps (RCP) for Point Beach Unit 1 are Westinghouse Model 93 pumps. Each pump casing is fabricated by welding four stainless steel (SA351 CF8) castings together. Thus, there are 3 circumferential pressure-retaining welds that are to be volumetrically inspected in accordance with Category B-L-1. Because the physical properties of the stainless steel castings and weld material prevent meaningful ultrasonic examination, the casing welds must be inspected using the miniature linear accelerator (MINAC).

This radiographic examination is performed by placing the MINAC inside the pump casing and placing the film on the outside of the pump. To perform the examination, the pumps must be completely disassembled. Disassembly to this extent is far beyond any disassembly expected except for this examination. Also, insulation on the casing exterior must be removed for film placement. Additionally, the pump bowl must be dry for installation of the MINAC. Therefore, all fuel assemblies must be removed from the reactor vessel and the vessel water level lowered to below the nozzles. Complete disassembly of the pump is also required to conduct the VT-1 examination in accordance with Category B-L-2.

This radiographic examination using the MINAC was performed on Point Beach Unit 1 "B" RCP during the Fall 1981 refueling outage. In addition, the same examination has been performed at several other sites. No problems have been found with the welds at any site. Additionally, no problems have been found during the Category B-L-2 visual examination. This visual examination was conducted at PBNP by using the video camera on the MINAC.

We believe that performing a volumetric examination of the Point Beach Unit 1 reactor coolant pump casing welds and a visual examination of the interior pressure retaining surface of one pump during the second ten-year inspection period does not provide an increase in safety commensurate with the associated cost potential for inadvertent pump damage, and expected radiation exposure. The following items have been considered:

1. Radiation Levels

Currently the average dose rates at the RCP are:

8' elevation general area ≤ 1 - 25 mR/hr Below RCP 10 - 800 mR/hr in RCP 700 - 10,000 mR/hr

> Attachment 1 Page 2

2. Total Estimated Exposure During The Examination

The whole body doses received during the fall 1981 examination of Unit 1, RCP-B are listed below. This list does not include the additional dose received while getting the plant to a condition where RCP disassembly could be performed (e.g., complete core unload).

÷	PBNP maintenance personnel during disassembly	5,237	
\sim	Contractor personnel - diffuser adapter removal	3,890	
	Contractor examination personnel	12,626	MR
-	Contractor personnel - insulation		
	removal/replacement	4,490	mR
	Contractor personnel - diffuser adapter		
	replacement	1,833	
-	PBNP Maintenance personnel - reassembly	6,017	mR
	TOTAL	34,093	mR

TOTAL

Pump Disassembly 3.

The Caragory B-L-1 and B-L-2 examinations require complete disassembly of the pump. The pump manufacturer (Westinghouse) does not require or recommend pump disassembly to perform normal maintenance or inspections. The only time disassembly to this degree has ever occurred was to perform this examina-tion during the fall of 1981. Therefore, very limited experience in this area may result in significnat damage or degradation to the pump. Additionally, complete pump disassembly is not anticipated for any other reason in the foreseeable future.

4. Pump Performance

The type of material used in these pumps is widely used throughout the industry and has performed very well. There have been no reported problems or failures with the casing welds of these model pumps. Additionally, the licensee has had no operational problems with the RCPs which could indicate potential degradation of the casing welds.

5. Excessive Cost

The estimated cost to disassemble/reassemble the pump, remove and reinstall insulation and to perform the examination is approximately \$810,000. Additionally, this examination is expected to extend the refueling outage a minimum of 5 days. Therefore, replacement power costs would be a minimum of about \$1.5 million. Any minor problems which might occur could significantly increase the cost of the examination.

6. Alternative Examinations

The alternative examinations we are proposing, as well as the already installed vibration monitoring system, will be sufficient to detect any problems which may occur.

- a) A visual (VT-2) examination of the casing exterior is performed in conjunction with the system leakage test every outage and each system hydro test. This examination will continue to be conducted.
- b) Once each interval, an exterior surface examination of approximately 1/3 of the accessible pump casing weld surface will be conducted in conjunction with a 100% exterior visual examination (VT-1).
- c) If maintenance of operational problems are encountered which necessitate disassembly of the casing internals of either pump, a VT-3 examination of the interior casing surface will be performed.
- d) Vibration monitors are currently installed on the motor frame near the lower radial bearing and on the motor shaft above the pump casing. These monitors will alarm on panel CO4 in the control room if either detects high vibration. The PBNP Operating Procedures Manual provides RCP vibration limits. If the limits are exceeded, we would expect to shut down and determine the cause. These monitors would most likely detect any problem which could lead to pump casing, welds, or rotating element failure.

In conclusion, we believe that, based on the preceding items, performing the volumetric inspection of the RCP casing welds and the visual examination of the internal surface of the pump casings during the second ten-year interval do not provide a commensurate increase in safety. We, therefore, request approval of this relief request.

ATTACHMENT 2

UNIT 2 RELIEF REQUEST

Relief Request No.

Description

RR-2-13

Reactor Coolant Pump casing welds

Component

Reactor Coolant Pump

Exam Area

Class 1 Casing Welds

Isometric or Component Drawing

See Attachment.

ASME Section XI Category

B-L-1 B-L-2

ASME Section XI Item Number

B12.10 B12.20

ASME Section XI Examination Requirement

- B-L-1: "The examinations performed during each inspection interval shall include 100% of the pressure-retaining welds in at least one pump in each group of pumps performing similar functions in system (e.g. recirculating coolant pumps)." The exam method shall be volumetric.
- B-L-2: "One pump in each of the group of pumps performing similar functions in the system shall be examined during each inspection interval. This examination may be performed on the same pump selected for the category B-L-1 examination." The exam method shall be visual.

Alternative Examination

A VT-2 examination of the casing exterior is performed in conjunction with system leakage test every outage and each system hydro test.

In addition, once each interval, an exterior surface examination of approximately 1/3 of the accessible pump casing weld surface will be conducted in conjunction with a 100% exterior visual examination (VT-1).

If maintenance or operational problems are encountered which necessitate disassembly of the casing internals of either pump, a VT-3 examination of the interior casing surface will be performed.

Reason for Relief Request

The two reactor coolant pumps (RCP) for Point Beach Unit 2 are Westinghouse Model 93 pumps. Each pump casing is fabricated by welding four stainless steel (SA351 CF8) castings together. Thus, there are 3 circumferential pressure-retaining welds that are to be volumetrically inspected in accordance with Category B-L-1. Because the physical properties of the stainless steel castings and weld material prevent meaningful ultrasonic examination, the casing welds must be inspected using the miniature linear accelerator (MINAC).

This radiographic examination is performed by placing the MINAC inside the pump casing and placing the film on the outside of the pump. To perform the examination, the pumps must be completely disassembled. Disassembly to this extent is far beyond any disassembly expected except for this examination. Also, insulation on the casing exterior must be removed for film placement. Additionally, the pump bowl must be dry for installation of the MINAC. Therefore, all fuel assemblies must be removed from the reactor vessel, and reactor vessel water level lowered to below the vessel nozzles. Complete disassembly of the pump is also required to conduct the VT-1 examination in accordance with Category B-L-2.

This radiographic examination using the MINAC was performed on Point Beach Unit 1 "B" RCP during the Fall 1981 refurling outage. In addition, the same examination has been performed at several other sites. No problems have been found with the welds at any site. Additionally, no problems have been found during the Category B-L-2 visual examination. This examination was conducted at PBNP by using the video camera on the MINAC.

We believe that performing a volumetric examination of the Point Beach Unit 2 reactor coolant pump casing welds and a visual examination of the interior pressure retaining surface of one pump during the second ten-year inspection period does not provide an increase in safety commensurate with the associated cost potential for inadvertent pump damage and expected radiation exposure. The following items have been considered:

1. Radiation Levels

Currently the average dose rates at the RCP are:

81	elevation	general	area	4	11	\sim	2.5	mR/hr
	OW RCP				10	\sim	800) mR/hr
in	RCP			7	00	\mathcal{H}^{\prime}	10,	000 mR/hr

2. Total Estimated Exposure During The Examination

The whole body doses received during the fall 1981 examination of Unit 1, RCP-B are listed below. This list does not include the additional dose received while getting the plant to a condition where RCP disassembly could be performed (e.g., complete core unload).

-12	PBNP maintenance personnel during disassembly	5,237	mR	
- 10	Contractor personnel - diffuser adapter removal	3,890	mR	
-	Contractor examination personnel	12,626	mR	
	Contractor personnel - insulation			
	removal/replacement	4,490	mR	
	Contractor personnel - diffuser adapter			
	replacement	1,833	mR	
-	PBNP Maintenance personnel - reassembly	6,017	mR	

TOTAL

34,093 mR

3. Pump Disassembly

The Category B-L-1 and B-L-2 examinations require complete disassembly of the pump. The pump manufacturer (Westinghcuse) does not require or recommend pump disassembly to perform normal maintenance or inspections. The only time disassembly to this degree has ever occurred was to perform this examination during the fall of 1981. Therefore, very limited experience in this area may result in significant damage or degradation to the pump. Additionally, complete pump disassembly is not anticipated for any other reason in the foreseeable future.

4. Pump Performance

The type of material used in these pumps is widely used throughout the industry and has performed very well. These have been no reported problems or failures with the casing welds of these model pumps. Additionally, the licensee has had no operational problems with the RCPs which could indicate potential degradation of the casing welds.

5. Excessive Cost

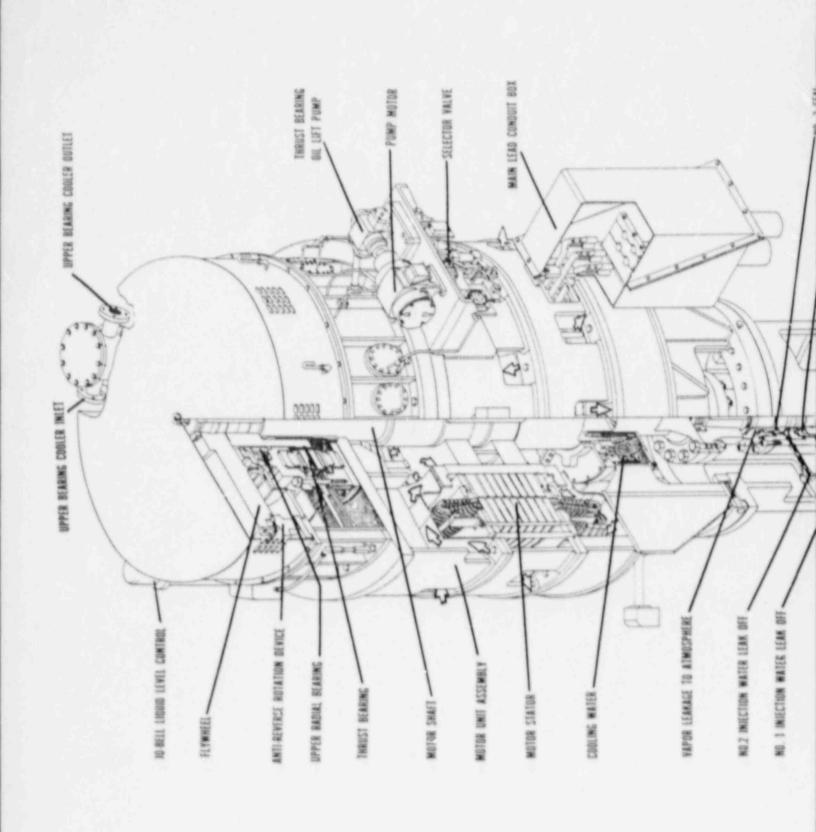
The estimated cost to disassemble/reassemble the pump, remove and reinstall insulation and to perform the examination is approximately \$810,000. Additionally, this examination is expected to extend the refueling cutage a minimum of 5 days. Therefore, replacement power costs would be a minimum of about \$1.5 million. Any minor problems which might occur could significantly increase the cost of the examination.

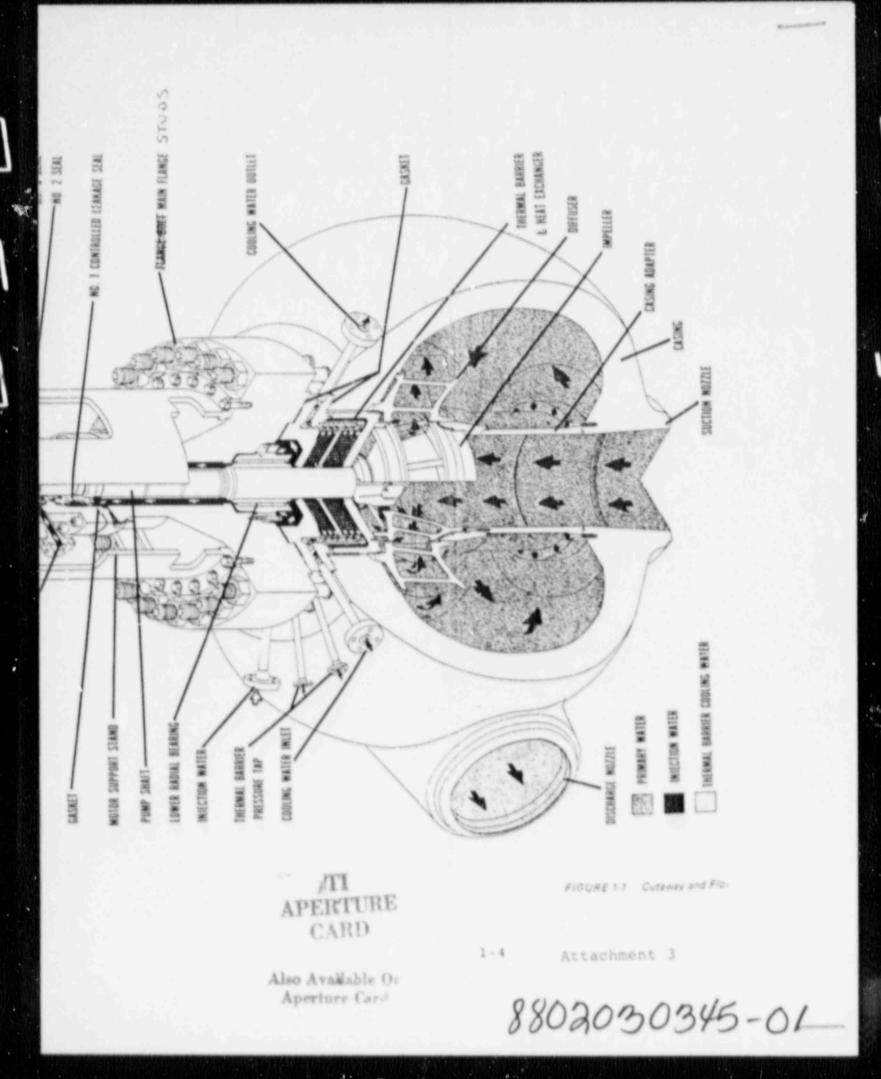
6. Alternative Examinations

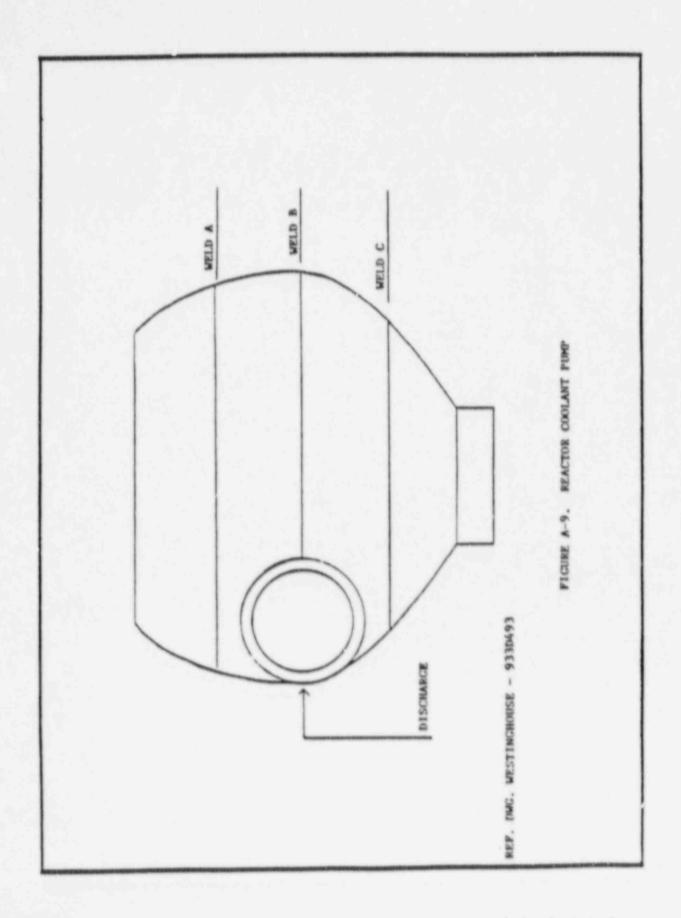
The alternative examinations we are proposing, as well as the already installed vibration monitoring system, will be sufficient to detect any problems which may occur.

- a) A visual (VT-2) examination of the casing exterior is performed in conjunction with the system leakage test every outage and each system hydro test. This examination will continue to be conducted.
- b) Once each interval, an exterior surface examination of approximately 1/3 of the accessible pump casing weld surface will be conducted in conjunction with a 100% exterior visual examination (VT-1).
- c) If maintenance of operational problems are encountered which necessitate disassembly of the casing internals of either pump, a VT-3 examination of the interior casing surface will be performed.
- d) Vibration monitors are currently installed on the motor frame near the lower radial bearing and on the motor shaft above the pump casing. These monitors will alarm on panel CO4 in the control room if either detects high vibration. The PBNP Operating Procedures Manual provides RCP vibration limits. If the limits are exceeded, we would expect to shut down and determine the cause. These monitors would most likely detect any problem which could lead to pump casing, welds, or rotating element failure.

In conclusion, we believe that, based on the preceding items, performing the volumetric inspection of the RCP casing welds and the visual examination of the internal surface of the pump casings during the second ten-year interval do not provide a commensurate increase in safety. We, therefore, request approval of this relief request.







.