

October 14, 2005

NRC 2005-0133  
10 CFR 50.55a

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

Point Beach Nuclear Plant, Units 1 and 2  
Dockets 50-266 and 50-301  
License Nos. DPR-24 and DPR-27

Request for Withdrawal:  
Relief Request from the Provisions of ASME Section XI,  
IWA-5244, "Buried Components," Relief Request 15 (TAC Nos. MC7770 and MC7771)

Reference: 1) Letter from NMC to NRC dated January 21, 2005 (NRC 2005-0015)  
2) NRC Request for Additional Information (RAI) dated August 12, 2005  
3) Letter from NMC to NRC dated August 26, 2005 (NRC 2005-0108)

Nuclear Management Company, LLC (NMC), hereby requests withdrawal of the relief requested in Reference 1.

In Reference 1, NMC submitted a request for relief for Point Beach Nuclear Plant (PBNP), Units 1 and 2, from certain requirements of the 1998 Edition through the 2000 Addenda of the American Society of Mechanical Engineers *Boiler and Pressure Vessel Code*, Section XI, IWA-5244, "Buried Components", for the fourth inservice interval in accordance with the provisions of 10 CFR 50.55a(a)(3)(ii). In Reference 2, the Nuclear Regulatory Commission (NRC) staff requested additional information regarding this relief. Reference 3 provided the NMC response to the staff's questions.

During a telephone conference between NRC staff and NMC personnel on October 3, 2005, the relief requested in Reference 1, was discussed. A subsequent evaluation of the Code by NMC personnel concluded that PBNP was in compliance with the Code; therefore, no relief was required.

IWA-5244 states, "(b) For buried components where a VT-2 visual examination cannot be performed, the examination requirement is satisfied by the following:  
(1) The system pressure test for buried components that are isolable by means of valves shall consist of a test that determines the rate of pressure loss. Alternatively, the

test may determine the change in flow between the ends of the buried components. The acceptable rate of pressure loss or flow shall be established by the Owner.

(2) The system pressure test for nonisolable buried components shall consist of a test to confirm that flow during operation is not impaired."

At PBNP, the service water system consists of a ring header with six service water pumps. The header has butterfly valves for isolating each section of buried piping. These valves, while adequate for normal maintenance activities, were not designed for leak-tight isolation of the system. Therefore, it is not possible to isolate the system in a manner that would allow the type of system pressure test stipulated in IWA-5244(b)(1). Since the system is not instrumented for flow, it is not possible to determine whether there is a change in flow between the ends of the buried piping and thereby determine the rate of pressure or flow loss. Thus, the only practical method of testing is to apply IWA-5244(b)(2), which stipulates a test to confirm that flow during operation is not impaired. This is done by a combination of inservice testing of the service water pumps and monitoring of plant components supplied by service water to ensure they are functioning within their required parameters.

Based on current inservice testing requirements and component performance at the plant, PBNP is in compliance with Code requirements for system leakage testing of buried components. Therefore, withdrawal of the relief requested in Reference 1 is hereby requested.

This letter contains no new commitments and no revisions to existing commitments.



Dennis L. Koehl  
Site Vice-President, Point Beach Nuclear Plant  
Nuclear Management Company, LLC

cc: Administrator, Region III, USNRC  
Project Manager, Point Beach Nuclear Plant, USNRC  
Resident Inspector, Point Beach Nuclear Plant, USNRC  
Mike Verhagen, Department of Commerce, State of Wisconsin