



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 24, 2015

Mr. Eric McCartney  
Site Vice President  
NextEra Energy Point Beach, LLC  
6610 Nuclear Road  
Two Rivers, WI 54241-9516

SUBJECT: POINT BEACH NUCLEAR PLANT UNIT 1 – RELIEF REQUEST VR-01;  
ALTERNATIVES TO CERTAIN INSERVICE TESTING REQUIREMENTS OF  
THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS CODE OF  
OPERATION AND MAINTENANCE OF NUCLEAR POWER PLANTS  
(TAC NO. MF6225)

Dear Mr. McCartney:

By letter dated May 14, 2015 (Agencywide Document Access and Management System Accession No. ML15134A086), NextEra Energy Point Beach, LLC (the licensee), submitted alternative request VR-01 to the U.S. Nuclear Regulatory Commission (NRC). The licensee proposed alternatives to certain inservice testing (IST) requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), for the IST program at the Point Beach Nuclear Plant (PBNP) Unit 1 for the fifth 10-year IST program interval.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.55a(z)(2), the licensee requested to use the proposed alternative in VR-01 on the basis that compliance with the specified requirements of the ASME OM Code would result in hardship or unusual difficulty, without a compensating increase in the level of quality and safety.

As discussed in the attached safety evaluation, the NRC staff determines that for alternative request VR-01, the proposed alternative provides reasonable assurance that the affected component is operationally ready.

Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(2). All other ASME OM Code requirements for which relief was not specifically requested and approved in the subject request remain applicable. Therefore, the NRC staff authorizes alternative request VR-01 at PBNP Unit 1 until Refueling Outage 36, which is scheduled to end by June 1, 2016.

E. McCartney

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If you have any questions, please contact Mahesh Chawla at (301) 415-8371 or [Mahesh.Chawla@nrc.gov](mailto:Mahesh.Chawla@nrc.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "David L. Pelton for".

David L. Pelton, Chief  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-266

Enclosure:  
Safety Evaluation

cc w/enclosure: Distribution via Listserv



UNITED STATES  
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST NO. VR-01 RELATED TO THE INSERVICE TESTING PROGRAM

FOR THE FIFTH 10-YEAR INTERVAL

NEXTERA ENERGY POINT BEACH, LLC

POINT BEACH NUCLEAR PLANT UNIT 1

DOCKET NO. 50-266

1.0 INTRODUCTION

By letter dated May 14, 2015 (Agencywide Document Access and Management System Accession No. ML15134A086), NextEra Energy Point Beach, LLC (the licensee), submitted alternative request VR-01 to the U.S. Nuclear Regulatory Commission (NRC). The licensee proposed alternatives to certain inservice testing (IST) requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), for the IST program at Point Beach Nuclear Plant (PBNP) Unit 1 for the fifth 10-year IST program interval.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.55a(z)(2), the licensee requested to use the proposed alternative in VR-01 on the basis that compliance with the specified requirements of the ASME OM Code would result in hardship or unusual difficulty, without a compensating increase in the level of quality and safety.

2.0 REGULATORY EVALUATION

Section 50.55a(f), "Inservice testing requirements," of 10 CFR requires, in part, that IST of certain ASME Code Class 1, 2, and 3 components must meet the requirements of the ASME OM Code and applicable addenda.

Section 50.55a(z) of 10 CFR, states, in part, that alternatives to the requirements of paragraph (f) of 10 CFR 50.55a may be authorized by the NRC if the licensee demonstrates that (1) the proposed alternative provides an acceptable level of quality and safety, or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The PBNP Unit 1 fifth 10-year IST interval began on September 1, 2012. The IST program complies with the ASME OM Code, 2004 Edition through 2006 addenda.

Enclosure

Based on the above, and subject to the NRC's findings with respect to authorizing the proposed alternatives to the ASME OM Code given below, the NRC staff finds that regulatory authority exists for the licensee to request, and the Commission to authorize, the alternatives requested by the licensee.

### 3.0 TECHNICAL EVALUATION

#### 3.1 Licensee's Alternative Request VR-01

##### ASME Code Components Affected

This request applies to the test frequency specifications of the ASME OM Code for the below listed relief valves.

Valve Number	Description	Class	Next Test Due Date
1CC-00763B	1P-1B Reactor Coolant Pump (RCP) Component Cooling Water Return Header Relief Valve	2	9/9/2015

##### Applicable Code Edition and Addenda

PBNP Unit 1 is currently in the fifth 10-year IST interval, which began on September 1, 2012. The code of record for the fifth 10-year IST interval is ASME OM Code, 2004 Edition through 2006 Addenda.

##### Applicable Code Requirements

ASME OM Code, Mandatory Appendix I, "Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants," Section I-1350, "Test Frequency, Classes 2 and 3 Pressure Relief Valves."

Section I-1350(a) 10-year test interval, Classes 2 and 3 pressure relief valves, with the exception of pressurized-water reactor main steam safety valves, shall be tested every 10 years, starting with initial electric power generation. No maximum limit is specified for the number of valves to be tested during any single plant operating cycle; however, a minimum of 20 percent of the valves from each valve group shall be tested within any 48-month interval. This 20 percent shall consist of valves that have not been tested during the current 10-year test interval, if they exist. The test interval for any individual valve shall not exceed 10 years.

##### Reason for Request

Relief valve 1CC-00763B, 1P-1B RCP Component Cooling Return Header Relief Valve testing was to occur in the Unit 1 Refueling Outage 35 (U1R35) in October 2014. The valve is one of four valves in Group I-6 of the PBNP IST program. The valve was inadvertently omitted from the refueling outage schedule. This omission is being reviewed in the corrective action program.

The omission was discovered on October 27, 2014. The component cooling water system had already been filled and vented in preparation for start-up. Plant personnel had also identified that no spare parts were available to support testing. To align the component cooling water system to support relief valve testing and perform testing without adequate spares would have placed PBNP at a significant disadvantage.

1CC-00763B was last tested on September 12, 2005. The 10-year test interval will expire on September 12, 2015. The next scheduled opportunity for testing will be in Unit 1 Refueling Outage U1R36, which is scheduled to begin on March 12, 2016. A 7-month extension beyond the 10-year testing interval is requested to allow time for testing to be completed.

In accordance with 10 CFR 50.55a(z)(2), PBNP requests relief from applicable ASME Code requirements for 1CC-00763B relief valve testing until the next Unit 1 Refueling Outage U1R36. NUREG-1482, Revision 2, "Guidelines for Inservice Testing at Nuclear Power Plants," Section 2.5, "Relief Request and Proposed Alternatives," states that a licensee may propose alternatives to ASME Code requirements if compliance with the specified requirement would result in hardship or unusual difficulty, without compensating increase in level of quality and safety.

Performance of this testing would require the isolation of component cooling water to the 1P-1B RCP. This cannot be performed with the plant on-line. Performance of this testing would require the plant to incur additional thermal cycles and the stopping and starting of several major plant components, which induces additional wear and risk unnecessarily.

#### Proposed Alternative and Basis for Use

The proposed alternative is to perform testing of the subject valve during the next Refueling Outage U1R36, which is scheduled to start on March 12, 2016. This is the next opportunity to perform the required testing.

#### Duration of Proposed Alternative

The proposed alternative will be utilized until the end of the next Refueling Outage U1R36, scheduled for March 2016.

### 3.2 NRC Staff Evaluation

Historically, licensees have applied, and the NRC staff has accepted, the standard technical specification (TS) definitions for IST intervals (including allowable interval extensions) to ASME OM Code required testing (NUREG-1482, Revision 2, Section 3.1.3, "Scheduling of Inservice Tests"). Recently, the NRC staff reconsidered the allowance of using TS testing intervals and interval extensions for IST not associated with TS surveillance requirements (SRs). As noted in Regulatory Issue Summary (RIS) 2012-10, "NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests," the NRC determined that programmatic test frequencies cannot be extended in accordance with the TS SR 3.0.2. Following this development, the NRC staff sponsored and co-authored an ASME OM Code inquiry and Code Case to modify the ASME OM Code to include TS-like test interval definitions and interval extension criteria. The resultant ASME Code Case OMN-20 was approved by the

ASME Operation and Maintenance Standards Committee on February 15, 2012, with the NRC representative voting in the affirmative. ASME Code Case OMN-20 was subsequently published in conjunction with the ASME OM Code, 2012 Edition.

The licensee does not propose to adopt Code Case OMN-20, but rather proposes a one-time extension to the test interval for the subject valve that is approximately the same test interval extension sanctioned by OMN-20. For 1CC-00763B, the licensee proposes to extend the interval from September 9, 2015, until the beginning of the next Refueling Outage U1R36 on March 12, 2016 (6 months and 3 days), whereas OMN-20 would allow an extension of up to 6 months. The licensee further specified that the required testing would be performed during Refueling Outage U1R36, which is scheduled to end by approximately June 1, 2016.

Requiring the licensee to meet ASME OM Code requirements without an allowance for frequency tolerance results in a hardship without a compensating increase in the level of quality and safety. Based on the prior acceptance by the NRC staff of the OMN-20 interval extension criteria, the staff finds that implementation of the test interval extension criteria proposed by the licensee is acceptable and provides reasonable assurance of operational readiness of the subject valve.

#### 4.0 CONCLUSION

As set forth above, the NRC staff determines that for alternative request VR-01, the proposed alternative provides reasonable assurance that the affected component is operationally ready. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(2). All other ASME OM Code requirements for which relief was not specifically requested and approved in the subject request remain applicable. Therefore, the NRC staff authorizes alternative request VR-01 at PBNP Unit 1 until Refueling Outage U1R36, which is scheduled to end by June 1, 2016.

Principal Contributor: John Billerbeck

Date: June 24, 2015

E. McCartney

- 2 -

If you have any questions, please contact Mahesh Chawla at (301) 415-8371 or [Mahesh.Chawla@nrc.gov](mailto:Mahesh.Chawla@nrc.gov).

Sincerely,

***/RA KGreen for/***

David L. Pelton, Chief  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-266

Enclosure:  
Safety Evaluation

cc w/enclosure: Distribution via Listserv

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**ADAMS Accession No.: ML15161A535**

**\*by memo**

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