

November 26, 1996

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

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SUBJECT: POINT BEACH NUCLEAR PLANT, UNIT NOS. 1 AND 2 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING THE POINT BEACH NUCLEAR PLANT,  
UNITS 1 AND 2, THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM  
PLAN ASSOCIATED REQUESTS FOR RELIEF NOS. RR-1-17 AND RR-2-21  
(TAC NO. M94982 AND M94982)

Dear Mr. Link:

We have reviewed Wisconsin Electric Power Company's (WEPCO's) March 1, 1996, submittal requesting relief from Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, "Rules for Inservice Examination of Nuclear Power Plant Components," 1986 edition, no addenda. Additional information is needed to complete our review. During the review, the staff determined that additional information was required. Enclosed is the request for additional information (RAI). Please provide your response to these questions by January 17, 1996. In addition, to expedite the review process, please send a copy of your RAI response to NRC's contractor, INEL, at the following address:

Michael T. Anderson  
INEL Research Center  
2151 North Boulevard  
PO Box 1625  
Idaho Falls, Idaho 83415-2209

If you have any questions, please contact me at (301) 415-1380.

Sincerely,

Original signed by  
Linda L. Gundrum, Project Manager  
Project Directorate III-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket Nos.: 50-266 and 50-301

Enclosure: RAI

cc w/encl: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Wisconsin Electric Power Company  
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Linda L. Gundrum, Project Manager  
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Office of Nuclear Reactor Regulation

Docket Nos.: 50-266 and 50-301

Enclosure: RAI

cc w/encl: See next page

Mr. Robert E. Link, Vice President  
Wisconsin Electric Power Company

Point Beach Nuclear Plant  
Unit Nos. 1 and 2

cc:

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Town Chairman  
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Chairman  
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Ms. Sarah Jenkins  
Electric Division  
Public Service Commission of Wisconsin  
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Madison, Wisconsin 53707-7854

REQUEST FOR ADDITIONAL INFORMATION FOR  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2  
THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PLAN  
RELIEF REQUESTS RR-1-17 AND RR-2-21

The Nuclear Regulatory Commission (NRC) is responsible for the review and disposition of licensee requests relating to inservice inspection requirements contained in the Code of Federal Regulations (CFR) 10 CFR 50.55a, and Section XI of the American Society of Mechanical Engineers' (ASME's) Boiler and Pressure Vessel Code. When submitting such requests, licensees are required to provide both a regulatory basis (by citing the appropriate section of 10 CFR 50.55a) and a technical discussion, supporting the request. This information is used in evaluating the request.

The staff has concluded that additional information and/or clarification is required to complete the evaluation. The licensee must state the specific paragraph of the regulations (10 CFR 50.55a) under which the request is submitted and provide supporting justification as discussed below.

The regulations provide that a licensee may propose an alternative to CFR or Code requirements in accordance with 10 CFR 50.55a(a)(3)(i) or 10 CFR 50.55a(a)(3)(ii). Pursuant to 10 CFR 50.55a(a)(3)(i), the proposed alternative must be shown to provide an acceptable level of quality and safety, i.e., essentially, be equivalent to the original requirement in terms of quality and safety. Pursuant to 10 CFR 50.55a(a)(3)(ii), the licensee must show that compliance with the original requirement results in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. Examples of hardship and/or unusual difficulty include, but are not limited to, excessive radiation exposure, disassembly of components solely to provide access for examinations, and development of sophisticated tooling that would result in only minimal increases in examination coverage.

A licensee may also submit a request for relief from ASME requirements. In accordance with 10 CFR 50.55a(g)(5)(iii), if a licensee determines that conformance with certain Code requirements is impractical for its facility, the licensee shall notify the Commission and submit, as specified in 10 CFR 50.4, information to support that determination. When a licensee determines that an inservice inspection requirement is impractical, e.g., the system would have to be redesigned, or a component would have to be replaced to enable inspection, the licensee should cite 10 CFR 50.55a(g)(5)(iii). The NRC may, giving due consideration to the burden placed on the licensee, impose an alternative examination requirement.

The staff has concluded that the following specific information and/or clarification is required to complete the review of the submittal:

Requests RR-1-17 and RR-2-21 were submitted pursuant to 10 CFR 50.55a(g)(5)(iv). References to this section of the regulations deal primarily with impracticality as a basis for relief. However, the information submitted with these requests does not support impracticality. It is unclear as to which paragraph of 10 CFR 50.55a these requests should be evaluated against. Provide appropriate references to the Code of Federal Regulations for the subject requests.

ENCLOSURE