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NPL 2000-0141

10 CFR 50.55(a)(3)

March 21, 2000

Document Control Desk U.S. NUCLEAR REGULATORY COMMISSION Mail Station P1-137 Washington, DC 20555

Ladies /Gentlemen:

DOCKET 50-266 AND 50-301 INSERVICE TESTING (IST) PROGRAM INTERVAL EXTENSION POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with ASME Section XI 1986 Edition, Subsection IWA-2430(d) and 2430(e), it is the intention of Wisconsin Electric (WE) to extend the Inservice Testing (IST) Third 10-Year Interval. The current Third 10-Year Interval termination date of December 20, 2000, was established as a result of relief requests included in the Second 10-Year Interval ASME XI pump and valve test program submittals dated February 10, 1981, and January 16, 1984. These relief requests applied for permission to reduce the Unit 2 interval to be consistent with Unit 1 for the purpose of applying the same Code edition and consistent schedule for both units. This action resulted in the Unit 1 and Unit 2 IST Third 10-Year Intervals both commencing on December 21, 1990. The dates of commercial operation for Units 1 and 2 were December 21, 1970, and October 1, 1972, respectively.

Extension of a 10-year interval is allowed by ASME Section XI. IWA-2430(d) states, "...each of the inspection intervals may be extended or decreased by as much as one year. Adjustments shall not cause successive intervals to be altered by more than one year from the original pattern of intervals." In addition, IWA-2430(e) states, "...for power units that are out of service continuously for six months or more, the inspection interval during which the outage occurred may be extended for the period equivalent to the outage and the original pattern of intervals extended according for successive intervals."

During the timeframe that spanned both Periods 2 and 3, Point Beach Nuclear Plant (PBNP) Unit 1 had a continuous nine-month outage from February 18, 1997, through December 1, 1997. Applying this nine-month period, along with the one-year Code allowance, results in the 21-month extension of the Unit 1 Third 10-Year Interval. NPL 2000-0141 March 21, 2000 Page 2

It is our desire to reestablish the Third 10-Year Interval duration for IST to be consistent with inservice inspection (ISI). Changing the current Unit 2 IST interval duration based on the date of initial commercial operation, and original pattern of intervals, results in an interval end date of September 30, 2002. Applying the 21-month extension to Unit 1, as was done for ISI, results in the Third Interval for Unit 1 expiring on August 31, 2002. This action will provide consistency between the duration of Third Interval dates applied to both ISI and IST. Extending the Third Interval to September 30, 2002, for Unit 2 and August 31, 2002, for Unit 1, will make it possible for us to take full advantage of ASME OM Code 1995 with 1996 Addenda. The changes in Code requirements between the ASME XI 1986 Edition and the 1995 Edition with 1996 Addenda of the ASME OM Code are significant. Extending the Third Interval duration for IST will not impact quality or safety and will afford a more manageable transition between a change in Code requirements. It will also more closely align the Third Interval duration applied to ISI and IST.

Please contact us if you have questions or desire additional information

Sincerely,

Cavia Marlager.

Regulatory Services & Licensing

FAF/tja

cc: NRC Resident Inspector NRC Regional Administrator NRC Project Manager PSCW