



Point Beach Nuclear Plant  
6610 Nuclear Rd., Two Rivers, WI 54241

(920) 755-2321

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Document Control Desk  
U.S. NUCLEAR REGULATORY COMMISSION  
Mail Station P1-137  
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Ladies and Gentlemen:

DOCKET 50-266  
ASME SECTION XI ISI LONG TERM PLAN EXTENSION  
POINT BEACH NUCLEAR PLANT, UNIT 1

This letter informs you of a change that is being made to the Point Beach Nuclear Plant (PBNP) Unit 1 Third 10-year interval ISI Long Term Plan. The change extends the interval from the current end date of November 30, 2000 to August 31, 2002. The interval is being extended because the operating cycle has been increased from 12 months to 18 months and to account for an extended shutdown period that occurred during 1997. This extension is permitted in accordance with ASME Section XI. Therefore, relief is not being requested.

10 CFR 50.55a(g), "Inservice inspection requirements," requires in part that ASME Class 1, 2 and 3 systems must be examined in accordance with the requirements set forth in the ASME Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components." For Point Beach, these requirements are reiterated in Technical Specification 15.4.2.B., "Inservice Inspection and Testing of Safety Class Components other than Steam Generator Tubes." The Edition of ASME Section XI 1986 Edition, no Addenda is currently applicable to Point Beach.

ASME Section XI, IWA-2430, and IWA-2432 require that the inservice inspection (ISI) program be divided into four 10-year inspection intervals. IWB-2412, IWC-2412 and IWD-2412 require that each 10-year ISI interval be divided into three periods, which are approximately 40 months in length. The required ISI examinations are to be distributed within the three periods between a fixed minimum and maximum percentage of the total examination population. Any additional examinations performed during the first or second periods above the percentages allowed cannot be credited toward the ensuing periods. All required Class 1, 2 and 3 inservice examinations are to be completed by the end of the third period, which coincides with the end of the third interval.

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The current third 10-year interval for Inservice Inspection at PBNP Unit 1 is:

	Beginning Date	Ending Date
Existing Third 10-Year Interval	12/1/1990	11/30/2000
Period 1	12/1/1990	3/31/1994
Period 2	4/1/1994	7/31/1997
Period 3	8/1/1997	11/30/2000

The revised and extended third 10-year interval Inservice Inspection at PBNP Unit 1 will be:

	Beginning Date	Ending Date
Revised Third 10-Year Interval	12/1/1990	8/31/2002
Period 1	12/1/1990	3/31/1994
Period 2	4/1/1994	7/31/1997
Period 3	8/1/1997	8/31/2002

This 21-month extension of the Third Interval is allowed by ASME Section XI, and is being applied to the ISI Program. The Inservice Testing (IST) Program is maintained as a separate program and is not being extended. The Fourth 10-Year Interval Inservice Inspection Program will be shortened by 21 months so that the end of the Fourth Interval remains unchanged.

Extension of a 10-Year Interval is allowed by ASME Code Section XI. Specifically, IWA-2430(d) states, "each of the inspection intervals may be extended or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than 1 year from the original pattern of intervals." In addition, IWA-2430(e) states, "for power units that are out of service continuously for 6 months or more, the inspection interval during which the outage occurred may be extended for a period equivalent to the outage and the original pattern of intervals extended accordingly for successive intervals." During the timeframe which spanned both Periods 2 and 3, PBNP Unit 1 had a continuous nine-month outage from February 18, 1997 to December 1, 1997. Applying those nine months, along with the one-year Code allowance results in the 21-month extension of Period 3 and the Third Interval. The approach applied to this extension is supported by various ASME Code Interpretations, including XI-1-86-54 and XI-1-92-57.

The benefit of extending the Unit 1 interval is that the Unit 1 ISI interval will end at the same approximate time as the Unit 1 Pressure Test Program Interval. This will allow consolidating the programs for the fourth interval to the same ASME Section XI Code edition and addenda. In addition, the interval extension will allow the Unit 1 programs to end at approximately the same time as the Unit 2 ISI and Pressure Test Programs. This will allow both units to be inspected utilizing the same ASME Section XI code edition and addenda.

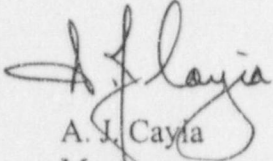
NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," Section 3.3.1 addresses the extension of intervals for IST and includes a discussion about ISI as well. This document supports the

approach being taken at PBNP Unit 1 when it states, "In Interpretation XI-1-86-54, the committee stated that the one year extension need not be applied only during the last one-third of the interval and that the extensions may be applied serially for both out-of-service and plant outage conditions." The document also confirms that no relief request is needed by stating, "Because the Code does not allow extension beyond one year, other than for extended outages, such an extension would require an alternative to the Code or exemption in order to comply with the regulatory requirements. The ASME Code allows intervals to be extended or decreased up to one year cumulative and also allow intervals to be extended when outages greater than 6 months occur."

This addition of 21 months to the Third Interval for ISI has no adverse effect on plant safety since the change is allowed by ASME Section XI. An amount of time equal to the extension of the Third Interval will be removed from the Fourth Interval so the original pattern of intervals will be maintained within the allowances granted by the ASME Code.

If you have any questions concerning the ISI Long Term Plan extension, please feel free to contact us.

Sincerely,



A. J. Cayla  
Manager,  
Regulatory Services & Licensing

CTP/tat

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