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Vice President Operations Support

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CO 01-0017

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Subject: Docket 50-482: Request to Implement ASME Code Case N-528-1,
"Purchase, Exchange, or Transfer of Material Between Nuclear Plant Sites"

Gentlemen:

In accordance with the provisions of 10 CFR 50.55a(a)(3)(i), Wolf Creek Nuclear Operating Corporation (WCNOC) requests relief from the administrative requirements of Section III of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code imposed by IWA-4220 (IWA-7210 in Editions and Addenda prior to the 1991 Addenda; IWA-4170 for the 1991 Addenda through the 1995 Edition, no Addenda). The proposed alternative, as described in Attachment I, "Wolf Creek Nuclear Operating Corporation Request for Relief to Use ASME Code Case N-528-1," provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i).

WCNOC requests approval of this relief request by July 1, 2001.

Attachment II contains a list of commitments identified in this correspondence.

If you have any questions concerning this matter, please contact me at (620) 364-4485, or Mr. Tony Harris at (620) 364-4038.

Very truly yours,

A handwritten signature in cursive script that reads "Clay C. Warren".

Clay C. Warren

CCW/rlr

Attachments

cc: J. N. Donohew (NRC), w/a
W. D. Johnson (NRC), w/a
E. W. Merschoff (NRC), w/a
Senior Resident Inspector (NRC), w/a

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**WOLF CREEK NUCLEAR OPERATING CORPORATION
REQUEST FOR RELIEF TO USE ASME CODE CASE N-528-1**

I. System/Components for Which Relief is Requested:

This request for relief proposes an alternative to the administrative requirements of Section III imposed by IWA-4220 (IWA-7210 in Editions and Addenda prior to the 1991 Addenda; IWA-4170 for the 1991 Addenda through the 1995 Edition, no Addenda) of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) when material meeting the definition in IWA-9000 is purchased, exchanged, or transferred between nuclear plant sites.

II. ASME Code Requirement:

IWA-4220 (IWA-7210 in Editions and Addenda prior to the 1991 Addenda; IWA-4170 for the 1991 Addenda through the 1995 Edition, no Addenda) of ASME Section XI contains the requirement for the Code applicability of replacement items. IWA-7000 of the 1989 Edition of the Code (IWA-4000, subsequent to the 1991 Addenda) provides the rules and requirements for the specification and construction of items to be used for replacement. Replacement includes the addition of components and system changes. IWA-7210 (IWA-4170) requires that an item to be used for replacement meets the original Construction Code (i.e., Section III of the Code) and existing design requirements. NCA-3000 of Section III of the Code defines the responsibilities of N Certificate Holders. NCA-3700 defines the responsibilities of holders of Certificates of Authorization, which is generally the organization which performs the activities to place and attach components to their support structures. The responsibilities of N Certificate Holders include surveying, qualifying, and auditing suppliers of subcontracted services, including material suppliers and material manufacturers. When material suppliers or material manufacturers hold a Quality System Certificate (Materials), as defined in NCA-3800, the Certificate Holder does not need to survey or audit the supplier for work within the scope of the Quality System Certificate.

III. Code Requirement from Which Relief is Requested:

Relief is requested from the requirements of IWA-4220 (IWA-7210 in Editions and Addenda prior to the 1991 Addenda; IWA-4170 for the 1991 Addenda through the 1995 Edition, no Addenda), and as an alternative, it is proposed that Code Case N-528-1 be utilized. A copy of Code Case N-528-1 is included for information.

IV. Basis for Relief:

Code Case N-528-1 applies to metallic material meeting the definition of IWA-9000 that is purchased, exchanged, or transferred between nuclear plant sites. Code Case N-528-1 provides an alternative to the specific administrative requirements of Section III that refer to possession of a Certificate of Authorization or Quality System Certificate (Materials). The case was approved by the ASME Boiler and Pressure Vessel Committee on May 7, 1999.

Code Case N-528-1 provides an alternative to the requirements of NCA-3700/NCA-3800 in that the responsibilities of the N Certificate Holders are, in fact, imposed on the supplying plant. All documentation required by NCA-3700/NCA-3800 is provided to the receiving plant with the material.

Code Case N-528-1 provides an alternative to the administrative requirements of ASME Section III imposed by IWA-4220. Wolf Creek Nuclear Operating Corporation (WCNOC) has reviewed Code Case N-528-1 and has determined that its implementation will substantially reduce nonbeneficial work activities required by IWA-4220.

The ASME Boiler and Pressure Vessel Code Committee evaluated the proposed alternatives contained in Code Case N-528-1 and determined that they are acceptable for replacement activities involving material meeting the definition in IWA-9000. The implementation of Code Case N-528-1 will not affect the level of quality and safety nor decrease the margin of public health and safety. The implementation of Code Case N-528-1 is consistent with the intent to eliminate nonbeneficial work activities and their associated costs. Therefore, it is requested that the proposed alternative be authorized pursuant to 10 CFR 50.55a(a)(3)(i).

V. Alternate Examination:

WCNOC will comply with the requirements of Code Case N-528-1 in lieu of the requirements of IWA-4220. As required by Code Case N-528-1, WCNOC will perform an evaluation of material which has been fabricated in accordance with specific dimensional requirements in accordance with IWA-7220 (IWA-4150) to determine its suitability for use in its intended application, including any differences that might affect form, fit, or function.

VI. Period for Which Relief is Requested:

This request for relief is requested from the date of approval by the NRC for the operating life of the plant.

VII. Implementation Schedule:

This request for relief will be implemented within 60 days after approval by the NRC.

VIII. Precedents:

Southern Nuclear Operating Company has submitted relief requests during 1999 and 2000 to the NRC to use a similar Code Case, N-528, at the Edwin I. Hatch Nuclear Plant and at the Vogtle Electric Generating Plant. The NRC approved the use of Code Case N-528 for use at the Edwin I. Hatch Nuclear Plant on March 20, 2000.

**CASE
N-528-1**

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: May 7, 1999

**See Numeric Index for expiration
and any reaffirmation dates.**

**Case N-528-1
Purchase, Exchange, or Transfer of Material
Between Nuclear Plant Sites
Section XI, Division 1**

Inquiry: As an alternative to the administrative requirements of Section III¹ imposed by IWA-4220 (IWA-7210 in Editions and Addenda prior to the 1991 Addenda; IWA-4170 for the 1991 Addenda through the 1995 Edition, no Addenda), what requirements apply to Owners when material meeting the definition in IWA-9000 is purchased, exchanged, or transferred between nuclear plant sites provided the following requirements are met?

Reply: It is the opinion of the Committee that, as an alternative to the administrative requirements of Section III imposed by IWA-4220 (IWA-7210 in Editions and Addenda prior to the 1991 Addenda; IWA-4170 for the 1991 Addenda through the 1995 Edition, no Addenda), material meeting the definition in IWA-9000 may be purchased, exchanged, or transferred between nuclear plant sites, provided the following requirements are met:

(a) Materials shall have been furnished to the supplying plant in accordance with NA-3700/NCA-3800.

¹ Administrative requirements refer to possession of a Certificate of Authorization or Quality System Certificate (Materials).

(b) Since receipt by the supplying plant, the material was not placed in service, welded, brazed, nor subjected to any operation that might affect the mechanical properties of the material (e.g., heat treatment or forming).

(c) Documentation required by NA-3700/NCA-3800 shall be provided to the receiving plant with the material.

(d) When the material is fabricated in accordance with specific dimensional requirements in addition to those provided in a national standard (e.g., nonwelded valve bonnet or nonwelded pump casing), the evaluation of suitability required by IWA-4160 (IWA-7220 in Editions and Addenda prior to the 1991 Addenda; IWA-4150 for the 1991 Addenda through the 1995 Edition, no Addenda) shall include an evaluation of the material for its intended application, including any differences that might affect form, fit, or function.

(e) The receiving plant shall obtain certification for the following:

(1) The supplying plant purchased the material in accordance with NA-3700/NCA-3800 and maintained it in accordance with their Quality Assurance Program.

(2) Since receipt by the supplying plant, the material was not placed in service, welded, brazed, nor subjected to any operation that might affect the mechanical properties of the material (e.g., heat treatment or forming).

(f) Use of this Case shall be documented on the NIS-2 for repair or replacement using material obtained in accordance with the provisions of this Case.

LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Tony Harris, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4038.

| COMMITMENT | Due Date/Event |
|--|---|
| The relief request will be implemented within 60 days of approval of the relief request. | Within 60 days of approval of the relief request. |