

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

April 17, 1990

WM 90-0062

U. S. Nuclear Regulatory Commission  
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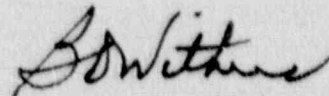
Subject: Docket No. 50-482: Request for Relief Concerning  
Procurement of ASME Section III Materials

Gentlemen:

The purpose of this letter is to transmit a request for relief from certain requirements delineated in Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. The attachment contains a request for relief from ASME Section XI and resulting Section III requirements regarding procurement of ASME Section III materials from vendors who are not ASME certificate holders.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff.

Very truly yours,



Bart D. Withers  
President and  
Chief Executive Officer

BDW/aem

Attachment

cc: R. D. Martin (NRC), w/a  
D. Persinko (NRC), w/a  
D. V. Pickett (NRC), w/a  
M. E. Skow (NRC), w/a

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### COMPONENT/MATERIAL IDENTIFICATION

American Society of Mechanical Engineers (ASME) Section III materials used in ASME Section XI Repairs and Replacements.

### DESCRIPTION

The term "material" as used herein is the ASME Section III use of the term. It is defined as metallic materials which are manufactured to an ASME Section II, SA, SB, or SFA specification or other material specifications allowed by ASME Section III. Material does not include parts or components. Parts are items which have work performed on them requiring verification by an Authorized Nuclear Inspector and which are subsequently stamped with the ASME Section III NPT stamp and are accompanied by a Code Data Report. Parts either attach to or become a portion of a component. Components are completed N-type stamped items such as vessels, pumps and valves and are accompanied by a Code Data Report.

### REQUESTED RELIEF

Subarticle IWA-7210 of ASME Section XI states in part, "Replacements shall meet the requirements of the edition of the Construction Code to which the original component or part was constructed....". In accordance with the design specifications governing the construction of Wolf Creek Generating Station (WCGS), materials are required to meet a variety of Editions of ASME Section III depending upon the specific component in which the materials are used. These Editions are predominately the 1974 and 1977 Editions with various Addenda. Section III subarticle NA-3700 (or NCA-3800) requires material manufacturers and material suppliers to hold a Quality System Certificate issued by ASME or have their programs surveyed, qualified and audited by an N-type Certificate Holder or Quality Systems Certificate (QSC) Holder. Pursuant to 10CFR50.55a(a)(3), Wolf Creek Nuclear Operating Corporation (WCNOC) is hereby requesting relief from ASME Section XI IWA-7210 and the resulting administrative and quality requirements of Section III NA-3700/NCA-3800 which preclude WCNOC from qualifying and procuring materials from material manufacturers and material suppliers who do not possess a QSC. WCNOC proposes that full compliance with the administrative and quality requirements of NA-3700/NCA-3800 of Section III results in hardship and unusual difficulties without a compensating increase in the level of quality and safety over that provided by the alternatives contained in this relief request and that the alternatives contained in this relief request provide an acceptable level of quality and safety.

### ALTERNATIVES

In lieu of the requirements of Section III which require ASME QSC or Certificate of Authorization Holders involvement in the qualification of material manufacturers and material suppliers who do not possess a QSC, WCNOC proposes the following alternatives:

- 1) If WCNOC selects vendors who do not possess an ASME QSC or Certificate of Authorization to furnish ASME materials for Section XI Repair and Replacements, WCNOC will qualify and audit these vendors (except as provided in (5) below) to assure the adequacy of these vendors' quality assurance programs and appropriate implementation of these programs in the manufacture and supply of materials;
- 2) Although not required by the 1974 and 1977 Editions of ASME Section III, WCNOC will utilize annual audits during the interval in which WCNOC is obtaining material from these vendors, as required by the Winter 1977 Addenda and later Editions and Addenda. In accordance with Regulatory Guide 1.144, Rev. 1 and the provisions of Section III NCA-3125, WCNOC may utilize audits performed by other organizations, but WCNOC maintains responsibility for the qualification of these vendors supplying material for WCNOC use;
- 3) In lieu of involvement of an ASME certificate holder, WCNOC will assure that material meets the requirements of ASME Section III, except as modified by this relief request;
- 4) WCNOC will perform these activities under the provisions of the NRC approved WCGS Quality Assurance Program; and
- 5) When procuring ASME materials from other nuclear power plants, WCNOC need not audit the quality assurance programs utilized by those plants. WCNOC considers these nuclear power plants as being qualified suppliers on the basis of the implementation of their QA programs in accordance with 10 CFR 50 Appendix B. WCNOC will assure that these materials meet the requirements of Section III, except as modified by this relief request.

#### BASIS FOR RELIEF

Due to the decline in nuclear power plant orders in the United States, many material manufacturers and material suppliers have allowed their ASME QSC to expire and many component manufacturers have allowed their N-type Certificate of Authorization to expire. Consequently, it is increasingly difficult for WCNOC to procure materials for use in ASME Section XI repairs and replacements. Although not allowed by the administrative and quality requirements of Section III, other currently available sources for materials include other nuclear power plants who do not possess a QSC, material manufacturers and material suppliers who have a quality assurance program but do not have a QSC, and component manufacturers who have allowed their ASME N-type Certificate of Authorization to expire.

The difficulties being experienced by WCNOC can be illustrated by the following examples. WCNOC is currently having problems with procurement of replacement ASME materials for the Standby Emergency Diesel Generators. The original manufacturer, Colt Industries, let their N-type Certificate of Authorization expire. The Colt supplied drawings and vendor manuals often describe items by part number and description but do not have adequate ASME description nor manufacturing details. WCNOC must try to obtain description



and details from Colt and supply this information to other vendors who possess an ASME QSC or Certificate of Authorization. Colt often considers these details to be proprietary. Although WCNOG can procure replacement parts and components from Colt under the provisions of Generic Letter 89-09, the replacement ASME materials are not covered by the Generic Letter and must be procured from a vendor who has an ASME QSC or N-type Certificate of Authorization. Another example involves procurement of ASME materials from typical material supply companies. If WCNOG finds the needed materials at a supplier who does not have a QSC, the procurement must be placed with an intermediate third-party supplier who possesses a ASME QSC. This third party may procure the materials from the WCNOG identified non-QSC supplier. The alternatives proposed in this relief request would resolve these examples by allowing WCNOG to qualify the vendors and make the desirable direct procurements.

ASME Section III uses the terms "Quality System Program" and "Material Identification and Verification Program" to identify limited scope quality assurance programs covering the scope of activities performed by material manufacturers and material suppliers. ASME Section III NA-3720/NCA-3820 requires that ASME verify the adequacy of the Quality System Program of the material manufacturer or the Material Identification and Verification Program of the material supplier before issuing a QSC. Alternatively, Section III provides that an organization who holds a QSC or a Certificate of Authorization may survey, qualify and audit the quality assurance programs of material manufacturers or material suppliers and procure materials from them without requiring the material manufacturer or material supplier to hold a QSC. The involvement of an ASME certificate holder in the qualification and audit process is intended to assure that appropriate quality assurance program requirements are utilized in the manufacture and supply of ASME materials. Under the scope of ASME Section III the ASME N-type Certificate of Authorization Holder, as the user of the material, has the final responsibility for the adequacy of the materials during the construction of new components.

The WCNOG Quality Assurance Program which has been approved by the NRC provides equivalent assurance that appropriate quality assurance program requirements are utilized in the manufacture and supply of materials. Included within the scope of the WCNOG QA Program are measures for qualification and audit of vendors, procurement document control measures, measures to verify the acceptability of procured items, measures to identify and control procured items and measures to control stored items. These provisions are used by WCNOG to qualify vendors and procure, accept, and store non-ASME safety-related materials. These provisions are equally adequate to allow WCNOG to qualify vendors not holding a QSC and procure and accept materials from these vendors for ASME Section XI repairs and replacements. No additional level of quality or safety would be obtained by the involvement of an ASME certificate holder. Since Section III administrative and quality requirements for new construction allow a certificate holder to qualify non-QSC material manufacturers and material suppliers, it is our position that WCNOG, as the Licensee ultimately responsible for acceptance of items at WCGS, should be allowed to qualify non-QSC material manufacturers and material suppliers for operation phase ASME Section XI repair and replacement.

Another source of ASME materials is other nuclear power plants who may have the needed materials in storage. These nuclear power plants are classified as material suppliers under the rules of ASME Section III and would be required to have a QSC or have their Material Identification and Verification (MI&V) Program qualified and audited by a QSC or Certificate of Authorization Holder. This MI&V Program is essentially a limited scope QA Program covering those activities associated with procuring, receiving, identifying, storing, and controlling material. Although other nuclear power plants may not possess a QSC issued by ASME, they do have full scope QA programs used to assure all procured safety-related items comply with specified requirements. These QA programs are implemented in accordance with 10 CFR 50 Appendix B and are periodically audited and inspected by utility QA organizations and the NRC. As a result, these QA programs are adequate to control those activities associated with procuring, receiving, identifying, storing and controlling ASME materials. Therefore, as noted in the proposed alternatives of this relief request, WCNOC will not audit other nuclear power plants but considers them as qualified suppliers on the basis of the implementation of their QA programs in accordance with 10 CFR 50 Appendix B. WCNOC will verify that the material received from other nuclear power plants meets the requirements of Section III, except as modified by this relief request.

Additional basis for this relief request is provided by letter dated October 2, 1989, in which the NRC approved a WCNOC relief request to procure Swagelok and Unistrut materials for ASME Section XI repair and replacement and by NRC Generic Letter 89-09. The NRC approval of the Swagelok/Unistrut relief request was specific to those two vendors but provides support for granting the generic relief requested herein. Approval of this generic relief request precludes the need for additional relief requests related to other specific material procurements. NRC Generic Letter 89-09 documents the difficulties nuclear power plants are having obtaining replacement N-type stamped components and provides generic relief from the requirements of Section III for ASME parts and components. However, the Generic Letter does not provide relief applicable to procurement of ASME Materials. In many cases, nuclear power plants need to procure ASME materials from component manufacturers who have let their Certificates of Authorization expire. This relief request provides alternatives to Section III applicable to the procurement of materials not covered by the Generic Letter.