

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Neil S. "Buzz" Carns
Chairman, President and
Chief Executive Officer

July 25, 1994

WM 94-0106

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

Subject: Docket No. 50-482: Request for Use of Code Case N-498-1

Gentlemen:

The purpose of this letter is to request approval for the use of ASME Section XI, Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems," pursuant to the requirements of 10 CFR 50.55a(a)(3). This code case allows the performance of the required third period Inservice Inspection (ISI) pressure test, with specified provisions, in lieu of performing the 10-year system hydrostatic test. This code case was approved by the ASME Boiler and Pressure Vessel Code Committee on May 11, 1994, but is not included in the most recent listing of NRC approved code cases in Revision 10 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability -- ASME Section XI Division 1." A copy of the approved code case is attached, although the code case has not been officially published by the ASME.

The first 10-year ISI Interval is scheduled for completion in September 1995, with an extension being taken to complete Reactor Pressure Vessel examinations. To date, ISI hydrostatic testing of Class 3 systems has not been performed at Wolf Creek Generating Station since Code Case N-498, which was originally only applicable to Class 1 and 2 systems, was expected to be revised to address alternatives to hydrostatic testing of Class 3 systems. It is requested that approval of this code case be granted by January, 1995. This would allow the creation/performance of the hydrostatic tests if this request is not granted. It is estimated that cost savings of approximately \$224,000.00 could result from the elimination of Class 3 hydrostatic tests. Wolf Creek Nuclear Operating Corporation considers the alternate testing requirements proposed in Code Case N-498-1 to constitute a reasonable, safe alternative to the existing hydrostatic testing requirements.

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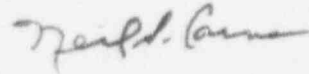
O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-8831

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If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4000, or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,



Neil S. Carns

NSC/jra

Attachment

cc: L. J. Callan (NRC), w/a
M. A. Miller (NRC), w/a
W. D. Reckley (NRC), w/a
J. F. Ringwald (NRC), w/a

Case N-498-1

Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3
Systems
Section XI Division 1

Inquiry:

What alternative rules may be used in lieu of those required by Section XI, Division 1, Table IWB-2500-1, Category B-P, Table IWC-2500-1, Category C-H, and Table IWD-2500-1, Categories D-A, D-B, and D-C, as applicable, for the 10-year system hydrostatic test?

Reply:

- (a) It is the opinion of the Committee that, as an alternative to the 10-year system hydrostatic test required by Table IWB-2500-1, Category B-P, the following rules shall be used.
 - (1) A system leakage test (IWB-5221) shall be conducted at or near the end of each inspection interval, prior to reactor startup.
 - (2) The boundary subject to test pressurization during the system leakage test shall extend to all Class 1 pressure retaining components within the system boundary.
 - (3) Prior to performing the VT-2 visual examination, the system shall be pressurized to nominal operating pressure for at least 4 hours for insulated systems and 10 minutes for noninsulated systems. The system shall be maintained at nominal operating pressure during performance of the VT-2 visual examination.
 - (4) Test temperatures and pressures shall not exceed limiting conditions for the hydrostatic test curve as contained in the plant Technical Specifications.
 - (5) The VT-2 visual examination shall include all components within the boundary identified in (a)(2) above.
- (b) It is the opinion of the Committee that, as an alternative to the 10-year system hydrostatic test required by Table IWC-2500-1, Category C-H, the following rules shall be used.
 - (1) A system pressure test shall be conducted at or near the end of each inspection interval or during the same inspection period of each inspection interval of Inspection Program B.
 - (2) The boundary subject to test pressurization during the system pressure test shall extend to all Class 2 components included in those portions of systems required to operate or support the safety system function up to and including the first normally closed valve, including a safety or relief valve, or valve capable of automatic closure when the safety function is required.
 - (3) Prior to performing the VT-2 visual examination, the system shall be pressurized to nominal operating pressure for a minimum of 4 hours for insulated systems and 10 minutes for noninsulated systems. The system shall be maintained at nominal operating pressure during performance of the VT-2 visual examination.
 - (4) The VT-2 visual examination shall include all components within the boundary identified in (b)(2) above.
 - (5) Test instrumentation requirements of IWA-5260 are applicable.

- (c) It is the opinion of the Committee that, as an alternative to the 10-year system hydrostatic test required by Table IWD-2500-1, Categories D-A, D-B, OR D-C (D-B for the 1989 Edition with the 1991 and subsequent Addenda), as applicable, the following rules shall be used.
- (1) A system pressure test shall be conducted at or near the end of each inspection interval or during the same inspection period of each inspection interval of Inspection Program B.
 - (2) The boundary subject to test pressurization during the system pressure test shall extend to all Class 3 components included in those portions of systems required to operate or support the safety system function up to and including the first normally closed valve, including a safety or relief valve, or valve capable of automatic closure when the safety function is required.
 - (3) Prior to performing the VT-2 visual examination, the system shall be pressurized to nominal operating pressure for at least 4 hours for insulated systems and 10 minutes for noninsulated systems. The system shall be maintained at nominal operating pressure during performance of the VT-2 visual examination.
 - (4) The VT-2 visual examination shall include all components within the boundary identified in (c)(2) above.
 - (5) Test instrumentation requirements of IWA-5260 are not applicable.