

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Otto L. Maynard
Vice President Plant Operations

December 27, 1995

WO 95-0189

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

Reference: Letter ET 95-0112 dated October 31, 1995, from
R. C. Hagan to USNRC
Subject: Docket 50-482: Clarification to Request for Use of Code
Case N-532

Gentlemen:

Pursuant to the provisions of 10 CFR 50.55a(a)(3), Wolf Creek Nuclear Operating Corporation (WCNOC) requested, by submittal of the Reference, approval for use of ASME Section XI, Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000," at Wolf Creek Generating Station, with one exception regarding reporting of corrective measures. In a December 7, 1995 telephone conference call with Mr. Jim Stone and NRC Technical Reviewers, WCNOC agreed to supplement and supersede our previous request as described below.

Code Case N-532 provides an alternative to the current ASME Section XI repair and replacement documentation requirements as well as regulatory reporting requirements relating to Inservice Inspection (ISI). This alternative will reduce the resources required to prepare NIS-2 forms and prepare and submit the ISI Summary Report currently required after each refueling outage. This is a significant reduction in the administrative burden required by IWA-6000. The use of Code Case N-532 only affects documentation and reporting requirements and does not affect the level of quality or safety provided by the Inservice Inspection Program.

Code Case N-532 was approved by the ASME Boiler and Pressure Vessel Code Committee on December 12, 1994, but is not included in the most recent listing of NRC approved code cases in Revision 11 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1." A copy of Code Case N-532 is attached for your convenience.

The NRC Staff has made recommendations supporting the development of Code Case N-532 in SECY-94-093 "NRC Staff Assessment of Reporting Requirements for Power Reactor Licensees." The use of Code Case N-532 is consistent with the recommendations of SECY-94-093.

9601020283 951227
PDR ADOCK 05000482
Q PDR

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

020100

An Equal Opportunity Employer M/F/H/VET

A047
11


This request to use Code Case N-532 includes compliance with the code case with the following clarification regarding reporting of "corrective measures." ASME Section XI uses the term, "corrective measures," in two different ways. One use of the term involves Code required activities such as repair and replacement. The other use of the term, as used in IWX-3000, involves maintenance activities that do not involve repairs or replacements. With this clarification, WCNOC proposes not to report corrective measures which only include routine maintenance activities such as tightening threaded fittings to eliminate leakage, torquing of fasteners to eliminate leakage at bolted connections, replacing valve packing due to unacceptable packing leakage, tightening loosened mechanical connections on supports, adjustment and realignment of supports, cleanup of corrosion on components resulting from leakage, etc.

Including these routine maintenance activities in the OAR-1 form required by Code Case N-532 would be a significant expansion of current requirements. In addition, it would be an unnecessary reporting burden and provides little benefit. Reporting of these minor maintenance corrective measures has no safety significance and clutters the reporting of the meaningful information of repairs, replacements, and evaluations performed to accept flaws and relevant conditions exceeding Section XI acceptance criteria. Corrective measures which refer to Code required activities, such as repair and replacement, will be reported in compliance with Code Case N-532. Therefore, use of Code Case N-532 is requested with the above clarification regarding the provisions in paragraph 2(c) for reporting corrective measures.

WCNOC considers the alternative documentation and reporting requirements of Code Case N-532 to be a reasonable alternative to existing requirements. Because the use of this alternative only affects documentation and reporting requirements, WCNOC considers this alternative to provide an acceptable level of quality and safety. Approval for use of Code Case N-532, with the noted clarification, is requested to support the refueling outage scheduled to begin in early March 1996.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4450, or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,



Otto L. Maynard

OLM/jra

Attachment

cc: L. J. Callan (NRC), w/a
W. D. Johnson (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

Approval Date: December 12, 1994

See Numeric Index for expiration
and any reaffirmation dates.

Case N-532

Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000¹

Section XI, Division 1

Inquiry: What alternatives may be used to the requirements of IWA-4910(d) and IWA-6210(e) for completion of Form NIS-2 following repair or replacement, and IWA-6210(c) and (d), IWA-6220, IWA-6230(b), (c), and (d), and IWA-6240(b) for preparation and submittal of the inservice summary report and Form NIS-1?

Reply: It is the opinion of the Committee that as an alternative to the requirements of IWA-4910(d), IWA-6210(c), (d), and (e), IWA-6220, IWA-6230(b), (c), and (d), and IWA-6240(b), the following provisions may be used. This Case shall be utilized at least until the end of the inspection period in which it was invoked.

1.0 CERTIFICATION OF THE REPAIR OR REPLACEMENT

(a) The Owner's Repair/Replacement Program shall identify use of this Case.

(b) A Repair/Replacement Plan shall be prepared in accordance with IWA-4140¹, and shall be given a unique identification number.

(c) Upon completion of all required activities associated with the Repair/Replacement Plan, the Owner shall prepare a REPAIR/REPLACEMENT CERTIFICATION RECORD, FORM NIS-2A.

(d) Form NIS-2A shall be presented to the Inspector for certification.

¹All references to IWA-4000 and IWA-6000 used in this Case refer to the 1992 Edition.

(e) The completed Form NIS-2A shall be maintained by the Owner.

(f) The Owner shall maintain an index of Repair/Replacement Plans in accordance with IWA-6340. The index shall identify the identification number required by (b) above and the inspection interval and period during which each repair or replacement was completed.

2.0 OWNER'S ACTIVITY REPORT PREPARATION AND SUBMITTAL

An OWNER'S ACTIVITY REPORT FORM OAR-1 shall be prepared and certified upon completion of each refueling outage. Each Form OAR-1 prepared during an inspection period shall be submitted following the end of the inspection period. Each Form OAR-1 shall contain the following:

(a) Abstract of applicable examinations and tests with the information and format of Table 1.

(b) A listing of item(s) with flaws or relevant conditions that required evaluation to determine acceptability for continued service, whether or not the flaw or relevant condition was discovered during a scheduled examination or test. The listing shall provide the information in the format of Table 2.

(c) Abstract for repairs, replacements and corrective measures performed, which were required due to an item containing a flaw or relevant condition that exceeded IWB-3000, IWC-3000, IWD-3000, IWE-3000, IWF-3000, or IWL-3000 acceptance criteria; even though the discovery of the flaw or relevant condition that necessitated the repair, replacement or corrective measure, may not have resulted from an examination or test required by this Division. If acceptance criteria for a particular item is not specified in this Division, the provisions of IWA-3100(b) shall be used to determine which repairs, replacements, and corrective measures are required to be included in the abstract. The abstract shall provide the information in the format of Table 3.

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

FORM NIS-2A REPAIR/REPLACEMENT CERTIFICATION RECORD

OWNER'S CERTIFICATE OF CONFORMANCE

I certify that the _____ represent by Repair/Replacement
repair or replacement

Plan number _____ conforms to the requirements of Section XI.

Type Code Symbol Stamp _____

Certificate of Authorization No. _____ Expiration Date _____

Signed _____ Date _____
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____

_____ have inspected the items described in Repair/Replacement Plan number _____ during the period _____ to _____ and state that to the best of my knowledge and belief, the Owner has performed all the activities described in the Repair/Replacement Plan in accordance with the requirements of Section XI.

By signing this certificate neither the inspector nor his employer makes any warranty, expressed or implied, concerning the activities described in the Repair/Replacement Plan. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or loss of any kind arising from or connected with this inspection.

Inspector's Signature Commissions _____
National Board, State, Province, and Endorsements

Date _____

This form (E00126) may be obtained from the Order Dept., ASME, 22 Law Drive, Box 2300, Fairfield, NJ 07007-2300.

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

TABLE 1
ABSTRACT OF EXAMINATIONS AND TESTS

Examination Category	Total Examinations Required for The Interval	Total Examinations Credited for This Period	Total Examinations Credited (%) For The Period	Total Examinations Credited (%) To Date for The Interval	Remarks
----------------------	--	---	--	--	---------

TABLE 2
ITEMS WITH FLAWS OR RELEVANT CONDITIONS THAT
REQUIRED EVALUATION FOR CONTINUED SERVICE

Examination Category	Item Number	Item Description	Flaw Characterization (IWA-330 ¹)	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Y or No)
----------------------	-------------	------------------	---	--

TABLE 3
ABSTRACT OF REPAIRS, REPLACEMENTS, OR CORRECTIVE MEASURES
REQUIRED FOR CONTINUED SERVICE

Code Class	Repair, Replacement, or Corrective Measure	Item Description	Description of Work	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes/No)	Date Complete	Repair/Replacement Plan Number
------------	--	------------------	---------------------	---	---------------	--------------------------------