

October 8, 1996

MEMORANDUM TO: William H. Bateman, Director
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

FROM: James C. Stone, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

ORIGINAL SIGNED BY:
KRIS THOMAS

SUBJECT: MEETING WITH WOLF CREEK NUCLEAR OPERATING CORPORATION

DATE & TIME: October 16, 1996
1-4 p.m.

LOCATION: One White Flint North
Room 6-B-11
11555 Rockville Pike
Rockville, Maryland 20852-2738

PURPOSE: To discuss ASME Code Case N-517 and the NRC staff's safety evaluation approving its use. The specific topics to be discussed are enclosed.

PARTICIPANTS*: NRC UTILITY
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R. Gallo D. Gimple
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U. Potapovs
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Docket No. 50-482

cc: See next page

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Attachment: Discussion Topics

*Meetings between NRC technical staff and applicants or licensees are open for interested members of the public, petitioners, intervenors, or other parties to attend as observers pursuant to "Commission Policy Statement on Staff Meetings Open to the Public" (59 Federal Register 48344, 9/20/94).

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Wolf Creek Generating Station

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DISCUSSION TOPICS

WCNOC COMMENTS ON THE NRC'S SEPTEMBER 11, 1996, SAFETY EVALUATION

CONCERNING CODE CASE N-517

1. In Section 1.0, Code Case N-517 only refers to NCA-3800 of the 1992 Edition with 1992 Addenda for qualifying material manufacturers and material suppliers. The rest of the code case activities do not invoke the 1992 Addenda.
2. In Section 2.0, ASME Section XI IWA-4170 is quoted from the 1992 Addenda. Code Case N-517 does not change the Edition and Addenda of Section XI to be used. The Edition and Addenda of Section XI are to be as required by 10 CFR 50.55a with later Editions and Addenda allowed, but not mandated. The code case specifically mandates the use of the 1992 Edition with the 1992 Addenda for only one activity: qualifying material manufacturers or material suppliers in accordance with NCA-3800 of ASME Section III (paragraph c of the code case).
3. In Section 2.0, ASME Section III NCA-3562 is quoted. However, this paragraph is not applicable to Code Case N-517 activities.
4. The intent of the first paragraph in Section 4.0 is unclear. Further discussion is requested. With regard to evaluating suppliers, the existing requirements in the WCNOC operating quality program apply and satisfy the requirements of the code case if the material manufacturers and material suppliers are accredited by ASME. If WCNOC qualifies a material manufacturer or material supplier, the utility will add some detail to the USAR to reflect a yearly audit in accordance with NCA-3800.
5. The third paragraph of Section 4.0 contains the statement: "The quality requirements of the NCA-4134.18 of the ASME Section III Code requires that each ongoing activity be audited at least annually and that this audit frequency be specified in the FSAR QA manual." This statement is not applicable to Code Case N-517 activities. NCA-4134 does not apply to activities covered by Code Case N-517 and use of it to require annual audits of ongoing code case activities is an expansion of the code case and the regulations.
6. The fourth paragraph of Section 4.0 contains the statement: "NCA-3562, NCA-4130, and NCA-3862 provide additional discussion on Section III Code activities that are required to be discussed in the FSAR QA manual and those activities that may be included in procedures that implement the provisions of the FSAR QA manual." NCA-3562 and NCA-4130 are not applicable to N-517 Code Case activities. The owner's quality assurance program for activities under the jurisdiction of ASME Section XI is required to be in accordance with IWA-1400(n). ASME Section XI references back to Section III for some requirements but does not change the owner's QA requirements, except that qualifying material

manufacturers and material suppliers is to be done in accordance with NCA-3800 of the 1992 Addenda. The intent of this statement is also unclear. It could be read to mean that the NRC required an owner to upgrade the QA program to NQA-1. As noted above, this is beyond the requirements of Code Case N-517 and would have to be justified before becoming a requirement.

7. Based on the above comments, the conclusions in Section 5.0 need to be revised. Further discussion of conclusions (a) and (b) is also requested.

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Docket File*

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