

January 31, 1997

Mr. Otto L. Maynard  
President and Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
Post Office Box 411  
Burlington, Kansas 66839

SUBJECT: IMPLEMENTATION OF ASME CODE CASE N-517, WOLF CREEK GENERATING  
STATION (TAC NO. M97749)

Dear Mr. Maynard:

The NRC staff has reviewed the January 2, 1997, letter that described how Wolf Creek Nuclear Operating Corporation (WCNOC) intends to implement ASME Code Case N-517. The staff is in general agreement with your implementation plans. However, the staff has some comments on the proposed implementation plan. These comments are enclosed.

Sincerely,

Original Signed By

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

Docket No. 50-482

Enclosure: Comments

cc w/encl: See next page

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## IMPLEMENTATION OF ASME CODE CASE N-517

### WOLF CREEK NUCLEAR GENERATING STATION

#### NRR STAFF COMMENTS

During a meeting on October 16, 1996, between Wolf Creek Nuclear Operating Corporation (WCNOC) and the NRC to discuss the NRC safety evaluation, dated September 11, 1996, for WCNOC's use of Code Case N-517, WCNOC indicated that it would be submitting additional correspondence to the NRC concerning the use of Code Case N-517. By letter dated January 2, 1997, WCNOC provided additional information describing how it will implement Code Case N-517 and identified elements and clarifications to be incorporated into its Updated Safety Analysis Report (USAR), Chapter 17.2, Quality Assurance (QA) Program to reflect the use of the code case. The following are the staff's comments on these proposed WCNOC QA Program elements and clarifications.

#### 1. WCNOC Proposed QA Program Element

Qualification of material manufacturers and suppliers shall be in accordance with the 1990 Edition, 1992 Addenda of NCA-3800. Additionally, those material manufacturers and suppliers qualified by WCNOC will be evaluated to ensure effective implementation of their quality assurance program.

#### NRC Comment

Item (b) of Section 5.0 of the NRC safety evaluation for the use of Code Case N-517 addresses the above proposed text. Suppliers of safety-related systems, structures, and components, including items supplied in accordance with NCA-3800, need to be evaluated to verify that they are effectively implementing their QA program. As discussed in the safety evaluation and in the October 16, 1996, meeting, WCNOC needs to verify that material manufacturers and suppliers, including those qualified by WCNOC and ASME that supply safety-related items in accordance with NCA-3800, are effectively implementing their QA Programs.

#### 2. WCNOC Proposed QA Program Element

Upgrading of stock material shall be in accordance with NCA-3867.4(e).

#### NRC Comment

The proposed text is consistent with Item (c) of Section 5.0 of the NRC safety evaluation.

#### 3. WCNOC Proposed QA Program Element

Acceptance of small products shall be stipulated in accordance with NX-2610.

NRC Comment

The proposed text is consistent with Item (d) of Section 5.0 of the NRC safety evaluation.

4. WCNOC Proposed QA Program Element

Activities defined above shall be performed in accordance with written procedures, instructions, or drawings and in accordance with the requirements of the USAR Quality Assurance Program.

NRC Comment

The proposed text is consistent with Item (e) of Section 5.0 of the NRC safety evaluation.

5. WCNOC Proposed QA Program Clarifications

On Page 2 of the attachment to its January 2, 1997, letter to the NRC, WCNOC identified six clarifications or unique quality requirements considered applicable when using Code Case N-517.

NRC Comment

Item (a) of Section 5.0 of the NRC safety evaluation for the use of Code Case N-517 addresses the need to identify the items addressed on Page 2 of the Attachment to the January 2, 1997, WCNOC letter. As discussed in the safety evaluation and in the October 16, 1996, meeting, WCNOC needs to incorporate the identified clarifications into its QA Program.

In addition to the proposed clarification on Page 2 on the Attachment to the January 2, 1997, letter, the WCNOC QA Program should state that when processing small products in accordance with NX-2610, the detailed plant procedures shall contain measures to provide assurance that the material is furnished in accordance with the material specification and with the applicable special requirements of the applicable ASME Section III Code Subsection.

6. Additional NRC Comment

Reference is made to performing an evaluation of material manufacturers and suppliers qualified by WCNOC and qualified by ASME. The evaluation of the material manufacturers and suppliers should be performed in order to verify that the organizations furnishing ASME Code items in accordance with NCA-3800 are effectively implementing their QA programs. NRC Regulatory Guide 1.144, "Auditing of Quality Assurance Programs for Nuclear Power Plants," Revision 1, dated 1980, and NRC Information Notice (IN) 86-21, "Recognition of American Society of Mechanical Engineers Accreditation Program for N Stamp Holders," dated March 31, 1986, including its Supplements 1 and 2, issued on December 1986, and

April 1, 1991, respectively, provide NRC positions on acceptable methods to verify that material manufacturers and suppliers are effectively implementing their QA programs.