



50482

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 25, 1996

LICENSEE: Wolf Creek Nuclear Operating Corporation

FACILITY: Wolf Creek Generating Station

SUBJECT: STAFF APPROVAL OF THE USE OF CODE CASE N-517 TO THE AMERICAN  
SOCIETY OF MECHANICAL ENGINEERS BOILER AND PRESSURE VESSEL CODE,  
WOLF CREEK GENERATING STATION (TAC NO. M96072)

On October 16, 1996, members of the NRC staff met with representatives from Wolf Creek Nuclear Operating Corporation (WCNOC) to discuss the NRC staff's safety evaluation approving the use of Code Case N-517 to the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Code Case N-517), for use at Wolf Creek. The NRC staff had approved the use of Code Case N-517 at Wolf Creek by letter dated September 11, 1996. However, the approval was conditioned on WCNOC taking certain actions to modify their Quality Assurance manual as contained in Chapter 17 of the Wolf Creek Updated Safety Analysis Report.

Background

Code Case N-517 was approved by the ASME on February 15, 1994. This code case provided an alternative to the possession of a Certificate of Authorization or Quality System Certificate (Materials) for the qualification of material manufacturers and suppliers, upgrading stock material, and acceptance of small products. Included in the code case are the requirements to be used in performing those activities. WCNOC requested a meeting with the NRC staff to discuss the staff's approval of the use of Code Case N-517 at Wolf Creek. The licensee was concerned that the NRC staff had gone beyond the requirements of Code Case N-517 in the conditions placed on the approval.

Summary

The licensee provided a list of discussion topics before the meeting. The results are as follows:

1. Licensee Topic 1: In Section 1.0 [of the staff's SE], 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.

Response to Item 1: The staff agrees that Code Case N-517 only refers to the 1992 Edition with the 1992 Addenda for the use of NCA-3800 for qualifying material manufacturers and material suppliers. However, as background for the staff's evaluation of WCNOC's use of Code Case N-517, it was necessary for the staff to consider other requirements of the ASME Code. It was discussed that the ASME Section XI Code permits the use of various editions of the ASME Section III Code depending on the licensee's commitments. The 1992 Edition of the Code with the 1992 Addenda was selected based on the fact that if an applicant for ASME

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accreditation desired to use the 1992 Edition of the Code with the 1992 Addenda for accredited activities, the applicant would have to comply with all applicable requirements of that edition and addenda. The staff also discussed that it recognizes that 10 CFR 50.55a has only endorsed the 1989 Edition of the ASME Section III and Section XI Codes. The staff considers the paragraphs referenced in our safety evaluation for WCNOG's use of Code Case N-517 to meet and be an acceptable alternative to the requirements of the 1989 Edition of the Code. Section 1.0 of the safety evaluation is a general background statement and was not intended to imply that the 1992 Addenda applied to the entire code case.

2. Licensee Topics 2 and 3: In Section 2.0 [of the staff's SE], 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).

Response to Item 2: See our response to Item 1 above.

In Section 2.0 [of the staff's SE], ASME Section III NCA-3562 is quoted. However, this paragraph is not applicable to Code Case N-517 activities.

Response to Item 3: Prior to the issuance of the safety evaluation, conversations between the staff and WCNOG discussed the detail that needed to be included in the Owner's FSAR QA program description for implementing Code Case N-517. The NRC safety evaluation attempted to discuss the level of detail to be included in the Owner's FSAR QA program description by referencing certain paragraphs from the ASME Code. Reference was made to NCA-3562 because page 6 of the safety evaluation refers to NCA 3552 (which references NCA-4130) for the contents of an N-Type certificate holder's QA manual. Also, page 6 of the safety evaluation referred to NCA-3862. Reference to NCA-3562, NCA-4130, and NCA-3862 in the staff's safety evaluation was for the purpose of identifying the types of ASME Code requirements to be included in a N-Type, Material Suppliers, or a Material Manufacturers QA manual. Also, it was discussed that the staff considers that for owners (NRC licensees electing to use Code Case N-517), similar requirements should be in the owner's FSAR QA program description. Further, it was noted on page 6, in the paragraph discussing the use of NCA-3562, the use of the term FSAR in front of the words QA Manual is an error and the term FSAR should be deleted twice in this paragraph.

3. Licensee Topic 4: The intent of the first paragraph in Section 4.0 [of the staff's SE] is unclear. Further discussion is requested. With regard to evaluating suppliers, the existing requirements in the WCNOG operating quality program apply and satisfy the requirements of the code case if the material manufacturers and material suppliers are accredited by ASME.

If WCNOG 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.

Response to Item 4: The first paragraph of the NRC safety evaluation references NRC IN 86-21 and its supplements and provides an NRC position on WCNOG's use of N-Type certificate holders, material suppliers, and material manufacturers accredited by ASME. It was discussed that the NRC position is that for vendors supplying ASME Code items to WCNOG, regardless of whether the ASME has accredited the vendor, WCNOG or some third party acting on behalf of WCNOG must verify that the vendor is effectively implementing its QA Manual for supplying ASME Section III Code items.

4. Licensee Topic 5: The third paragraph of Section 4.0 [of the staff's SE] 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.

Response to Item 5: It was discussed that the NRC considers the use of Code Case N-517 by owners (NRC licensees) to only permit the deletion of the ASME Section III administrative requirements for obtaining accreditation by ASME, and that all other ASME Section III quality and technical requirements apply. Since the scope of Code Case N-517 includes both the activities performed by an N-Type certificate holder (NX-2610) and by material suppliers and manufacturers, then both NCA-3800 and NCA-4000 quality requirements apply to owners using the code case. It was further discussed that the NRC recognizes that most licensees have committed to ANSI N18.7, as endorsed by RG 1.33, and that some of these requirements may be less stringent than those required by the ASME Section III code. Additionally, it was discussed that should Wolf Creek want to use its current FSAR QA program requirements instead of those required ASME Section III for Code Case N-517 scope activities, Wolf Creek should identify such requirements and submit a request to the NRC for using such requirements. Also, the NRC noted that, in their opinion, NCA-4130, including NCA-4134, applies to N-Type certificate holders, and that because Code Case N-517 addresses NX-2610 activities, the unique NCA-4134 requirements would apply to owners using this code case.

5. Licensee Topic 6: The fourth paragraph of Section 4.0 [of the staff's SE] 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.

Response to Item 6: See response to Item 5. It was further discussed that it is not the NRC's intention that licensees using Code Case N-517 revise their FSAR QA program description to be consistent with the requirements of NQA-1. Licensee's QA programs presently meet and in most cases exceed the requirements of NQA-1. However, in addition to NCA-4000 requiring that NQA-1 be met, NCA-4000 provides additional, ASME unique quality requirements, and NCA-3800 provides unique quality requirements not found in either NQA-1, and in all probability not in the Owners FSAR QA program description. During the meeting, the NRC staff discussed several of the unique ASME Section II, QA requirements. As discussed in Item 5 above, the staff informed WCNOG that should WCNOG want to use its current FSAR QA program requirements instead of those required ASME Section III, WCNOG should identify such requirements and submit a request to the NRC for using these requirements in lieu of the unique quality requirements of NCA-4000 and NCA-3800 (applicable for Code Case N-517 scope activities).

6. Licensee Topic 7: Based on the above comments, the conclusions in Section 5.0 [of the staff's SE] need to be revised. Further discussion of conclusions (a) and (b) is also requested.

Response to Item 7: The conclusions provided the conditions that the staff had placed on the use of Code Case N-517. After discussion, the licensee agreed that (b) through (e) were acceptable as written and would be included in the QA program in the FSAR. Item (a) was discussed including the requirement for the annual audit of on-going activities. It was agreed that licensees could use their current audit frequency of 2 years for internal audits and that the annual audit requirement would apply only external activities. However, as discussed in Items 5 and 6 above, the NRC position on the use of Code Case N-517 is that all applicable Section III quality and technical requirements must be followed unless the licensee specifically requests exceptions to them and provides alternatives acceptable to the staff. WCNOG indicated that it would be submitting additional correspondence to the NRC concerning

exceptions to ASME Section III quality requirements applicable for Code Case N-517 scope activities.

A list of attendees is enclosed (Attachment 1). The licensee provided a handout that is enclosed (Attachment 2).

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

Attachments: 1. Attendance List  
2. Licensee's Handout

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Meeting Participants

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DOCUMENT NAME: 1016MEET.WC1

OFC	PDIV-2/PM	PDIV-2/LA	NRR:HQMB*
NAME	JStone:ye	EPeyton	RGramm
DATE	11/22/96	11/25/96	11/18/96

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MEETING WITH WOLF CREEK NUCLEAR OPERATING CORPORATION

CODE CASE N-517

ATTENDANCE LIST

October 16, 1996

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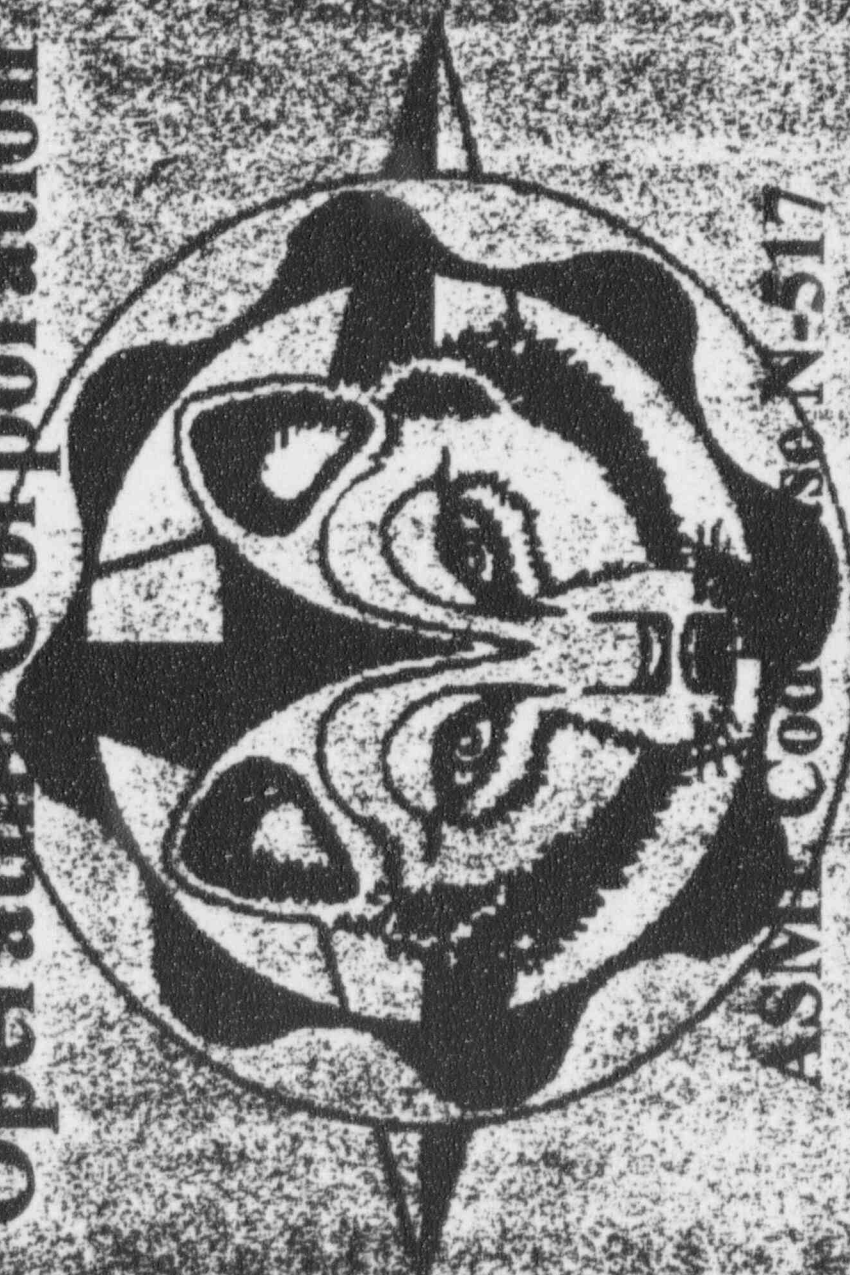
# **Wolf Creek Nuclear Operating Corporation**



ASME Case N-517

October 6, 1996

# **Wolf Creek Nuclear Operating Corporation**



**October 6, 1996**

# Introduction

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## ◆ Purpose

- Meeting requested to discuss NRC's SER for WCNOG's request to utilize ASME Code Case N-517.

## ◆ Agenda

- Background/historical perspective
- Comments on NRC's SER
- Follow-up Actions
- Working meeting to discuss comments and SER conditions

# Background/Historical Perspective

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- ◆ NRC Relief Request for Unistrut/Swagelok
- ◆ WCNOG obtained ASME NPT Certificate in 1991. Obtained in conjunction with State required National Board NR Certificate
- ◆ WCNOG is not renewing its NPT Certificate
- ◆ Use of Code Case N-517:
  - ASME development of Case N-517
  - WCNOG's request for use
  - NRC's approval with conditions

# Comments on SER

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- ◆ SER use of Section III NCA-4000:
  - NCA-4000 is not applicable to Case N-517
  - Requiring NCA-4000 provisions is not consistent with other implementation of Regulations
- ◆ SER condition to revise FSAR
  - SER required level of detail not consistent with previous approval of FSAR Chapter 17
  - Section III's QA Manual format and content not applicable to Owner's Section XI QA Program
  - Details appropriate for implementing procedures rather than FSAR

## Comments on SER - continued

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- ◆ SER conditions do not improve quality of Case activities
- ◆ Edition and Addenda applicability in SER
  - Only qualifying MM/MS is to 1992 Addenda
  - Section XI as specified in 50.55a
- ◆ The ASME consensus process adequately specified requirements for use of N-517 without additional SER conditions

## Follow-up Actions

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- ◆ Submittal of additional information, discussed today, concerning the conditions imposed in the SER.

# Working Meeting

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- ◆ Detailed Discussion of SER conditions
  - SER 1.0 - 1992 Edition with 1992 Addenda applies only to qualification of suppliers.
  - SER 2.0
    - » 1992 Edition with 1992 Addenda applies only to qualification of suppliers
    - » Section XI applicability's as required by 10 CFR50.55a
    - » ASME Section III NCA-3562 is not applicable to Code Case.
  - SER 4.0
    - » Qualification of Suppliers
      - ◆ accredited by ASME
      - ◆ qualified by WCNOC
    - » Applicability of NCA-4138.18
      - ◆ auditing of code activities
      - ◆ App. B quality program acceptability
    - » Level of detail required in operating quality program.
    - » Applicability of Section XI IWA - 1400(n) for an Owner's quality assurance program