

March 4, 1997

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE WOLF CREEK
GENERATING STATION, SECOND 10-YEAR INTERVAL INSERVICE INSPECTION
PROGRAM PLAN AND ASSOCIATED REQUESTS FOR RELIEF (TAC NO. M93381)

Dear Mr. Maynard:

The NRC staff is continuing to review and evaluate the second ten-year interval inservice inspection program plan and associated requests for relief from the ASME B&PV Code, Section XI requirements for Wolf Creek Generating Station. Additional information is required from Wolf Creek Nuclear Operating Company in order for the staff to complete its review. The information required is detailed in the enclosure.

In order for the staff to meet its inservice inspection program review schedule, it is requested that a response be provided within 60 days of receipt of this letter. In addition, to expedite the review process, please send a copy of the RAI response to NRC's contractor, INEL, at the following address:

Michael T. Anderson
INEL Research Center
2151 North Boulevard
P.O. Box 1625
Idaho Falls, Idaho 83415-2209

Sincerely,

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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: Request for Additional
Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Idaho Falls, Idaho 83415-2209

Sincerely,

A handwritten signature in cursive script, reading "James C. Stone", is written over the typed name.

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

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cc w/encl: See next page

cc w/encl:

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Steelman, Missouri 65077-1032

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-482

REQUEST FOR ADDITIONAL INFORMATION

SECOND 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM PLAN

1. Scope/Status of Review

The Nuclear Regulatory Commission (NRC) is responsible for the review and disposition of licensee requests relating to inservice inspection requirements contained in the Code of Federal Regulations (CFR) 10 CFR 50.55a, and the American Society of Mechanical Engineers (ASME), Section XI. Included within each request, licensees are required to provide both a regulatory basis (by citing the appropriate section of 10 CFR 50.55a), and a technical discussion, to support the request. This information is used to establish the context for each evaluation.

The staff has reviewed the additional information submitted in the letter dated December 9, 1996. As a result of this review, additional information is required in order to complete the staff's review.

2. Additional Information Required

Based on the review of the December 9, 1996 submittal, the staff has concluded that the following additional information and/or clarification is required to complete the evaluation.

1. Under Item A, the licensee provided the following additional paragraph:

"When pressure testing piping systems that contain boron for the purpose of controlling reactivity, the insulation will be removed, on the same frequency as that required for performance of the pressure test, and VT-2 visually examined, without the system at normal operating pressure. Any evidence of leakage will be evaluated in accordance with IWA-5250."

The current position that the NRC has adopted on insulation removal is consistent with Code Case N-533, *Alternative Requirements for VT-2 Visual Examination of Class 1 Insulated Pressure Retaining Bolted Connections*. Paragraph (2) of this Code case states: "Each refueling outage the insulation shall be removed from the bolted connection, and a VT-2 visual examination shall be performed. The connection is not required to be pressurized. Any evidence of leakage shall be evaluated in accordance with IWA-5250."

Provide the basis for the current position to remove the insulation on a per period basis only.

2. Under Item B, the licensee noted an addition to the corrective measures as follows:

"In addition, if the leakage is identified at a bolted connection that is in service and the evaluation supports continued service, the bolt removal and subsequent VT-3 may be deferred to the next component/system outage of sufficient duration."

Later editions of the Code have provided an alternative to the removal of all bolting at a leaking connection. The licensee's approach to perform an evaluation of the bolted joint to determine the need to remove one bolt is considered too generic to be considered acceptable. An evaluation to determine whether deferral is acceptable is not supported by ISI philosophy. Therefore the licensee should consider the withdrawal of this paragraph.

3. For Item C, Request for Relief I2R-12 addresses both Categories C-F-1 and C-F-2. However, the licensee noted that the relief does not apply to ferritic piping (C-F-2) as inspection will continue to be performed on the longitudinal welds in ferritic piping in accordance with the Code. It is unclear why the licensee has taken exception to ferritic pipe longitudinal welds. Is this request for austenitic piping only? Provide the basis for the current position.