

WOLF CREEK

NUCLEAR OPERATING CORPORATION

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DEC 15 2000

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U. S. Nuclear Regulatory Commission
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Subject: Docket No. 50-482: Request to Implement ASME Code Case OMN-1, "Alternative Rules for Preservice and Inservice Testing of Certain Electric Motor-Operated Valve Assemblies in Light-Water Reactor Power Plants"

- References: 1) Nuclear Regulatory Commission Final Rule 10 CFR Part 50, "Industry Codes and Standards; Amended Requirements," (64 FR 51370), dated September 22, 1999
- 2) Letter dated November 26, 1997, from W. H. Bateman, USNRC, to O. L. Maynard, Wolf Creek Generating Station, "Relief Request from the Requirements of ASME Code, Section XI, Wolf Creek Generating Station (TAC NO. M97883)"

Gentlemen:

10 CFR 50.55a(f), "Inservice testing requirements," paragraph (4), requires that inservice testing (IST) of certain American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel (B&PV) Code Class 1, 2, and 3 components be performed in accordance with Section XI, "Rules for Inservice Inspection of Nuclear Plant Components," of the ASME Code and applicable addenda incorporated by reference in paragraph (b) of 10 CFR 50.55a, "Codes and standards." Paragraph (4)(iv) of 10 CFR 50.55a(f) indicates that subsequent editions and addenda of the ASME code that are incorporated by reference in paragraph (b) of 10 CFR 50.55a may be implemented by a licensee subject to NRC approval. Paragraph (4)(iv) further states that portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met.

The above referenced final rule publication revised, in part, the IST requirements for motor operated valves. In the final rule, the NRC amended its regulations to incorporate by reference the 1995 Edition and 1996 Addenda of the ASME Code for Operation and Maintenance of Nuclear Power Plants (Subsection ISTC). The rule also permits the use of ASME Code Case OMN-1.

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Previously approved Wolf Creek Nuclear Operating Corporation (WCNOC) Relief Request 2VR-7 (Reference 2) allowed WCNOC to use ASME Code Case OMN-1 with certain limitations. However, the limitations set forth in WCNOC Relief Request 2VR-7 were superseded by the Rule Changes implemented in the fall of 1999.

WCNOC intends to continue to implement ASME Code Case OMN-1 in lieu of ASME OMa-1988 Part 10, with the exception of ASME OMa-1988, Part 10, section 4.2.2, "Valve Seat Leakage Rate Test." As provided in Reference 2, WCNOC will now follow the limitations and conditions set forth in 10 CFR 50.55a instead of those committed to in Reference 2.

There are no new licensing commitments made in this submittal. If you have any questions concerning this matter, please contact me at (316) 364-4034, or Mr. Tony Harris at (316) 364-4038.

Very truly yours,



Richard A. Muench

RAM/rlr

cc: J. N. Donohew (NRC)
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E. W. Merschoff (NRC)
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