



10 CFR 50.55a(g)(4)(iv)

LIC-15-0114
November 24, 2015

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Fort Calhoun Station (FCS), Unit 1
Renewed Facility Operating License No. DPR-40
NRC Docket No. 50-285

Subject: Request to Use a Portion of a Later Edition of the ASME B&PV Code, Section XI

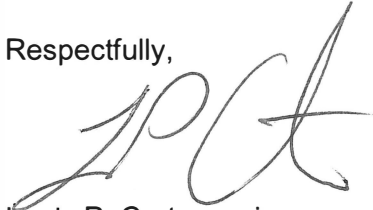
In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), the Omaha Public Power District (OPPDP) is requesting NRC approval to use a portion of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components." Specifically, OPPDP proposes to implement Mandatory Appendix I, I-2600, "Appendix VIII Examination," from the 2007 Edition through the 2008 Addenda of the ASME B&PV Code. Implementation of Mandatory Appendix I, I-2600 from the 2007 Edition through 2008 Addenda will permit the use of Appendix VIII Performance Demonstration Initiative (PDI) techniques to be used for components to which Appendix VIII is not applicable. The approval of the 2007 Edition through the 2008 Addenda of the ASME B&PV Code for use was announced in the Federal Register on June 21, 2011 (i.e., 76 FR 36232).

OPPDP requests the review and approval of this request by September 9, 2016.

There are no regulatory commitments contained in this letter.

If you should have any questions regarding this submittal or require additional information, please contact Mr. Bill R. Hansher at 402-533-6894.

Respectfully,

A handwritten signature in black ink, appearing to read 'LPC', written in a cursive style.

Louis P. Cortopassi
Site Vice President and CNO

LPC/TJH/mle

Attachment: Request to Use a Portion of a Later Edition of the ASME B&PV Code, Section XI

c: M. L. Dapas, NRC Regional Administrator, Region IV
C. F. Lyon, NRC Senior Project Manager
S. M. Schneider, NRC Senior Resident Inspector

Request to Use a Portion of a Later Edition of the ASME B&PV Code, Section XI

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Reference 1, the Omaha Public Power District (OPPD) requests NRC approval to use specific provisions of a later edition and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for the plant identified in Section 2 of this letter. Currently, ASME Section XI, IWA-2232 (for the edition and addenda identified in Section 2) requires that ultrasonic (UT) examinations be conducted in accordance with Mandatory Appendix I. Current versions of Mandatory Appendix I, I-2000 (for the edition identified in Section 2) required the performance of ultrasonic examinations in accordance with Appendix III, Appendix VIII, or Section V, Article 4, without substitution. In lieu of the current versions (for the edition identified in Section 2) of Mandatory Appendix I, I-2000 (for the edition identified in Section 2), OPPD requests the use of Mandatory Appendix I, I-2600 ("Appendix VIII Examination") from the 2007 Edition through the 2008 Addenda of the ASME B&PV Code, Section XI. This provision states:

- a) For components to which Appendix VIII is not applicable, examination procedures, personnel, and equipment qualified in accordance with Appendix VIII may be applied, provided such components, materials, sizes, and shapes are within the scope of the qualified examination procedure.
- (b) Examination coverage shall be in accordance with I-3000.
- (c) No other I-1000 or I-2000 requirements apply.

OPPD will implement I-2600 from the 2007 Edition through the 2008 Addenda of the ASME B&PV Code. This new provision permits the use of Appendix VIII Performance Demonstration Initiative (PDI) techniques for components to which Appendix VIII is not mandatory.

The 2007 Edition through the 2008 Addenda of the ASME B&PV Code was approved for use in Federal Register 76 FR 36232, dated Tuesday, June 21, 2011.

Industry experience has demonstrated that use of Appendix VIII techniques for detection and characterization of flaws is equal to or surpasses the requirements of the ASME Code, Section XI, Appendix III or Section V, Article 4.

1. ASME Code Component(s) Affected:

This change may be applied to examinations where the alternative conditions of I-2600 are applicable.

2. Applicable Code Edition and Addenda:

<u>PLANT</u>	<u>INTERVAL</u>	<u>EDITION</u>	<u>START</u>	<u>END</u>
Fort Calhoun Station, Unit 1	Fourth	1998 Edition, through 2000 Addenda	October 31, 2003	June 6, 2017

Fort Calhoun has extended the Fourth ISI Interval to June 6, 2017 as allowed by IWA-2430(d)(1) and IWA-2430(e) as noted in Reference 3.

3. Proposed Subsequent Code Edition and Addenda (or Portion):

OPPD requests the use of Mandatory Appendix I, I-2600 from the 2007 Edition through the 2008 Addenda of the ASME B&PV Code, Section XI for the remainder of the current interval as specified in Section 2.

4. Related Requirements:

10 CFR 50.55a(g)(4)(iv) states:

"Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met."

10 CFR 50.55a(b)(2) incorporated by reference Section XI, Division 1, of the ASME B&PV Code, 2007 Edition through the 2008 Addenda as approved in Reference 2. There are no limitations or modifications in 10 CFR 50.55a(b)(2) related to Mandatory Appendix I, I-2600 ("Appendix VIII Examination") for the 2007 through 2008 Addenda of Section XI.

In addition, the I-3000 Examination Coverage requirements listed in the ASME 2007 Edition with the 2008 Addenda will be utilized in conjunction with the components examined in accordance with I-2600.

5. Duration of Proposed Request:

This provision will be used for the remainder of the interval as specified in Section 2.

6. References:

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004
2. Federal Register 76 FR 36232, dated Tuesday, June 21, 2011
3. Letter from OPPD (Louis P. Cortopassi) to NRC (Document Control Desk) "Revised Fourth Ten-Year Interval Inservice Inspection (ISI) Interval," dated November 3, 2014 (ML14308A658) (LIC-14-0099)