



Jaime H. McCoy
Vice President Engineering

November 30, 2015

ET 15-0031

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Reference: Federal Register Notice, 80 FR 56820, dated September 18, 2015

Subject: Docket No. 50-482: Comments on the NRC Proposed Rulemaking and Guidance for 10 CFR 50.55a, "Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases," Docket ID NRC-2011-0088

Dear Secretary:

On September 18, 2015, the Nuclear Regulatory Commission (NRC) published the reference. The reference proposed rule changes to amend the regulations to incorporate by reference seven recent editions and addenda to the American Society of Mechanical Engineers (ASME) codes for nuclear power plants and a standard for quality assurance. The NRC is also proposing to incorporate by reference four ASME code cases.

The purpose of this letter is to provide comments on the proposed rulemaking. The attachment provides comments to the proposed changes to 10 CFR 50.55a.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4156, or Cynthia R. Hafenstine (620) 364-4204.

Sincerely,

A handwritten signature in black ink that reads "Jaime H. McCoy".

Jaime H. McCoy

JHM/rlt

Attachment

cc: M. L. Dapas (NRC), w/a
C. F. Lyon (NRC), w/a
N. H. Taylor (NRC), w/a
Document Control Desk (NRC), w/a
Senior Resident Inspector (NRC), w/a

Comments on Proposed Rulemaking Changes to 10 CFR 50.55a

The following provides Wolf Creek Nuclear Operating Corporation's (WCNOC) comments on the proposed rulemaking to 10 CFR 50.55a.

§50.55a(b)(2)(viii)(H) – Concrete Containment Examinations: Eighth Provision

This needs to only be applicable to IWL-2512(a), not the entire IWL-2512. The evaluation of IWL-2512(b) should be documented in the Program Plan, and not be required to be listed on the IWA-6000 ISI Summary Report.

§50.55a(b)(3)(ii)(A) – MOV Diagnostic Test Interval

We currently test to the OMN-1 Code Case which allows a maximum interval of 10 years. Is this rulemaking intended to require us to limit our existing frequency to less than 5 yrs?

§50.55a(b)(3)(ii)(D) – MOV Stroke Time

We currently stroke time test MOV's per the OMN-1 Code case at a frequency based on the functional margin. We do not want stroke time testing to be required on a quarterly basis since it is not beneficial for determining the adequacy of the valve.

WCNOC believes this does not have a clear safety benefit vs. cost impact to operating stations.

§50.55a(b)(3)(iii)(C) – Flow-Induced Vibration

This does not appear to be applicable to the ASME OM Code for operation. This would add a lot of extra work for the industry and provide little to no support in detecting or monitoring for degradation of the valve. This seems like it would be something pre-installation as a potential failure mechanism to be monitored during initial maintenance testing.

WCNOC believes this does not have a clear safety benefit vs. cost impact to operating stations.

§50.55a(g)(6)(ii)(D)(1) – Implementation

The final rule typically becomes effective 30 days after being published in the Federal Register. Implementation of Code Case N-729-4 and conditions would be required by the first refueling outage following the effective date of the final rule.

§50.55a(g)(6)(ii)(D)(3) – Bare Metal Visual Frequency

Acceptance of this condition will require the frequency of the bare metal visual exam to be every outage that a volumetric exam is not performed. The exception to this frequency would be if a surface exam of the wetted surface was performed during the last non-visual NDE, which most cold head plants have not done. This requirement should not be applied until the first refueling outage at least 6 months after the final rule becomes effective in order to give utilities time to implement the changes (i.e., prepare for the Bare Metal Visual exam).

§50.55a(g)(6)(ii)(F)(1) – Implementation

Implementation (with conditions) of Code Case N-770-2 would be required by the first refueling outage following the effective date of the final rule. This requirement should not be applied until the first refueling outage at least 6 months after the final rule becomes effective in order to give utilities time to implement the changes.