



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR RELIEF FROM AN ASME SECTION XI REQUIREMENT

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-482

1.0 INTRODUCTION

In a letter dated August 15, 1991, Wolf Creek Nuclear Operating Corporation (the licensee) submitted a request for relief from the replacement requirement (IWA-7210) in Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (the Code). The request involves a valve disc purchased from Union Electric (Callaway Plant). The disc is used in the Class 1 check valve EP-8818A in the residual heat removal to accumulator injection discharge loop 1 of the Wolf Creek Generating Station. Since the disc was originally purchased to ASME Section III, the replacement must meet the construction code. The disc is required to meet the 1974 Edition up to and including the Winter 1975 Addenda of Section III of the Code. Because the licensee did not possess an ASME Certificate at the time of the procurement, paragraph NA-3720(b) of Section III of the Winter 1975 Addenda of the Code requires that the disc be procured from a material supplier that holds a Quality System Certificate (QSC) issued by the ASME.

Contrary to this requirement, the licensee procured the disc from a supplier (Union Electric) that did not possess a QSC. The disc was installed in December 1987 and is presently in the valve. The licensee is requesting that the disc be allowed to remain in service until it would need to be replaced for maintenance or performance reasons. The licensee's basis for this request is discussed below.

2.0 DISCUSSION

The licensee asserts that the disc meets the technical and quality requirements of the Code even though the administrative requirement of Section III of the Code noted above was not met. The basis of this assertion follows:

The supplier (Union Electric) ordered the replacement disc from Westinghouse NSID in accordance with the provisions of the NSID Quality Assurance Program and implementing procedure DPR 405.5, "Renewal Parts Procurement and Supply System." The licensee specifies the same requirements when ordering Westinghouse replacement Class 1 items.

Because the supplier's plant (Callaway) and the licensee's plant (Wolf Creek) are SNUPPS plants, the subject check valve has the same identification number (EP-8818A) and was constructed to the identical Code, specifications, and drawing requirements for both plants. The technical requirements of the disc are the same for both plants. The licensee has verified that its technical requirements for the disc were met by the supplied disc.

Westinghouse NSID ordered the replacement disc from Westinghouse AESD. Westinghouse AESD had ASME N and NPT Certificates of Authorization at the time the replacement disc was provided. The licensee has verified by review of the supplied documentation that Westinghouse AESD furnished the disc to the supplier as ASME Section III Class I material in compliance with ASME Section III requirements. Therefore, the available documentation shows that the replacement disc met licensee and Code technical and quality requirements up to the point in time at which the licensee ordered the disc from the supplier.

The administrative requirement of Section III of the Code for material suppliers to possess a QSC is intended to ensure proper identification, traceability, and control while the material is in the material supplier's possession. The supplier (Union Electric) maintained the disc in accordance with its NRC-accepted Quality Assurance Program while in storage at the Callaway Plant. The supplier procurement documents and receipt records provided to the licensee with the disc allowed the licensee to verify traceability of the disc while in storage at the supplier's Callaway Plant and verify the identity of the disc and the accompanying Certified Material Test Reports. Therefore, even though the supplier did not possess a QSC, the licensee has verified that the Code certified disc received by the supplier was acceptably maintained while at the supplier's Callaway Plant and subsequently delivered to the licensee.

The licensee has reviewed the records supplied by the supplier and its own receipt and installation records and has verified that the ASME requirements have been met, with the single exception that the supplier did not possess an ASME QSC. Additionally, the licensee states that EP-8818A was disassembled and inspected in April 1990 during the third refueling outage as part of the Wolf Creek Generating Station Check Valve Degradation Program and that no contamination of the disc was identified during this inspection.

The licensee contends that replacement of the disc with one supplied by an ASME QSC N-type Certificate Holder would provide no additional quality or safety and that replacement of the disc would unnecessarily increase the radiation dose to workers and create unnecessary radwaste. The licensee therefore has concluded that replacement of the disc is impractical until such time that the disc would need to be replaced for maintenance or performance reasons.

3.0 EVALUATION

The licensee's request was discussed with licensee personnel by telephone on August 28, 1991. The licensee clarified that the acceptability of the data package for the replacement disc had been initially reviewed during the Wolf

Creek receipt inspection and recently re-reviewed by Nuclear Plant Engineering. These reviews verified the receipt of the Westinghouse supplied data report, the associated NDE report, and the certification from Union Electric of proper maintenance in the Union Electric warehouse. In essence, the licensee contends that the supplier's NRC-accepted QA program and the documented application of that program to the disc procurement and handling provide an equivalent degree of quality assurance for the disc.

On the basis of the information above, the staff has concluded that the licensee's disc procurement met ASME Section XI rules for replacements except that the supplier (Union Electric) did not possess a QSC. Further the staff concludes that the licensee has not demonstrated a hardship exists to grant relief pursuant to 10 CFR 50.55a(g)(6)(i). However, the staff does conclude that an acceptable alternative to the Code requirement for the material supplier to have a QSC has been provided and; therefore, the licensee's program has met the requirements in 10 CFR 50.55a(a)(3)(i) by implementing an acceptable alternative for the supplier QSC requirement in ASME Code Section III, Part NA-3720(b) which has provided an acceptable level of quality and safety. Therefore, the staff finds the disc in question suitable for service in check valve EP-8818A.

Date: October 31, 1991