WOLF CREEK
NUCLEAR OPERATING CORPORATION

Robert C. Hagan
Vice President Engineering

October 31, 1995

ET 95-0117

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Subject: Docket 50-482: Request for Use of Code Case N-498-2

Gentlemen:

Pursuant to the provisions of 10 CFR 50.55a(a)(3), Wolf Creek Nuclear Operating Corporation (WCNOC) requests approval for use of ASME Section XI, Code Case N-498-2, "Alternative Requirements for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems," at Wolf Creek Generating Station (WCGS). Code Case N-498-2 was approved by ASME on June 9, 1995, and will be published in the 1995 Code Case Supplement No. 1. Code Case N-498-2 has not yet been incorporated into Regulatory Guide 1.147 "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1." A pre-published copy of Code Case N-498-2 is attached for your convenience.

The NRC previously approved Code Case N-498-1 "Alternative Requirements for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems," for use at WCGS. Code Case N-498-1 provides for use of a system leakage test as an alternative for the required Section XI ten year system hydrostatic test. Code Case N-498-2 eliminates the required four hour hold time for insulated systems and the ten minute hold time for non-insulated systems, which is required by Code Case N-498-1. The revision to eliminate the hold times was approved by the ASME consensus process indicating the technical acceptability of Code Case N-498-2.

Approval of Code Case N-498-2 will reduce hardships during the eighth refueling outage and subsequent refueling outages. WCNOC estimates the critical path outage schedule would be reduced approximately two days. In addition, running the Emergency Core Cooling System (ECCS) pumps for four hours, in recirculation, would be detrimental to the pumps. Installation of temporary pumps to maintain pressure for four hours would result in additional costs and additional radiological exposure and defeats part of the intent of Code Case N-498-1. Code Case N-498-1 was written to eliminate the hardships associated with the performance of hydrostatic tests, part of which was the installation of temporary pumps.

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Removal of the insulation from insulated components would reduce the necessary hold time to ten minutes. However, removal of insulation would also result in unnecessary costs and additional radiological exposure. With approval of Code Case N-498-2, insulation will not have to be removed and utilization of temporary pumps, to meet the four hour hold time, would not be required.

Approval for use of Code Case N-498-2 is requested by January 12, 1996, to support the refueling outage scheduled to begin in early March 1996.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4553, or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,

Robert C. Hagan

RCH/jra

Attachment

cc: L. J. Callan (NRC), w/a
D. F. Kirsch (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

CASE

N-498-2

Approval Date: June 9, 1995

See Numerical Index for expiration and any reaffirmation dates.

Case N-498-2

Alternative Requirements for 10-Year System Hydrostatic Testing for Class 1, 2 and 3 Systems Section XI, Division 1

Inquiry: What alternative rules may be used in lieu of those required by Section XI, Division 1, Table IWB-2500-1, Category B-P, Table IWC-2500-1, Category C-H, and Table IWD-2500-1, Categories D-A, D-B, and D-C, as applicable, for the 10-year system hydrostatic test?

Reply:

(a) It is the opinion of the Committee that as an alternative to the 10-year system hydrostatic test required by Table IWB-2500-1, Category B-P, the following rules shall be used.

(1) A system leakage test (IWB-5221) shall be conducted at or near the end of each inspection interval, prior to reactor startup.

(2) The boundary subject to test pressurization during the system leakage test shall extend to all Class 1 pressure retaining components within the system boundary.

(3) Prior to performing the VT-2 visual examination, the system shall be pressurized to nominal operating pressure. No holding time is required prior to performing the VT-2 visual examination. The system shall be maintained at nominal operating pressure during performance of the VT-2 visual examination.

(4) Test temperatures and pressures shall not exceed limiting conditions for the hydrostatic test curve as contained in the plant Technical Specifications.

(5) The VT-2 visual examination shall include all components within the boundary identified in (a)(2) above.

(6) Test instrumentation requirements of IWA-5260 are not applicable.

(b) It is the opinion of the Committee that, as an alternative to the 10-year system hydrostatic test required by Table IWC-2500-1, Category C-H, the following rules shall be used.

(1) A system pressure test shall be conducted at or near the end of each inspection interval or during the same inspection period of each inspection interval of Inspection Program B.

(2) The boundary subject to test pressurization during the system pressure test shall extend to all Class 2 components included in those portions of systems required to operate or support the safety system function up to and including the first normally closed valve, including a safety or relief valve, or valve capable of automatic closure when the safety function is required.

(3) Prior to performing the VT-2 visual examination, the system shall be pressurized to nominal operating pressure. No holding time is required prior to performing the VT-2 visual examination. The system shall be maintained at nominal operating pressure during performance of the VT-2 visual examination.

(4) The VT-2 visual examination shall include all components within the boundary identified in (b)(2) above.

(5) Test instrumentation requirements of IWA-5260 are not applicable.

(c) It is the opinion of the Committee that, as an alternative to the 10-year system hydrostatic test required by Table IWD-2500-1, Categories D-A, D-B, or D-C (D-B for the 1989 Edition with the 1991 and subsequent Addenda), as applicable, the following rules shall be used.

(1) A system pressure test shall be conducted at or near the end of each inspection interval or during the same inspection period of each inspection interval of Inspection Program B.

(2) The boundary subject to test pressurization during the system pressure test shall extend to all Class 3 components included in those portions of systems required to operate or support the safety system function up to and including the first normally closed valve, including a safety or relief valve, or valve capable of automatic closure when the safety function is required.

(3) Prior to performing the VT-2 visual examination, the system shall be pressurized to nominal operating pressure. No holding time is required prior to performing the VT-2 visual examination. The system shall be maintained at nominal operating pressure during performance of the VT-2 visual examination.

(4) The VT-2 visual examination shall include all components within the boundary identified in (c)(2) above.

(5) Test instrumentation requirements of IWA-5260 are not applicable.