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September 29, 1998
NG-98-1674

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Authorization for Use of ASME Code Case N-508-1

Reference: ASME Code Case N-508-1

File: A-100, A-286

The ASME Code, Section XI, IWA-7000 contains requirements governing replacement activities. The Code treats the rotation of snubbers and relief valves as a Code replacement that must meet these requirements, resulting in excessive documentation requirements for the removal and installation of snubbers and relief valves solely for the purpose of testing.

ASME Code Case N-508-1, "Rotation of Serviced Snubbers and Pressure Relief Valves for the Purpose of Testing," provides alternative requirements which may be used when snubbers and pressure relief valves are rotated from stock and installed on components within the Section XI boundary. This Code Case provides alternative criteria which eliminate the inappropriate administrative controls and documentation requirements associated with an ASME Section XI replacement while ensuring that technical requirements are still maintained.

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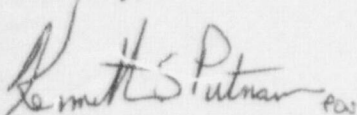
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IES Utilities hereby requests authorization to utilize the alternative requirements described in Code Case N-508-1. As stated in footnote 6 to 10CFR50.55a, the use of Code Cases may be authorized by the Director of the Office of Nuclear Reactor Regulation, pursuant to 10CFR50.55a(a)(3). According to 10CFR50.55a(a)(3), the proposed alternatives must provide an "acceptable level of quality and safety." Use of Code Case N-508-1 does so, as discussed in the attachment.

Sincerely,

Handwritten signature of Kenneth E. Pevler in cursive ink.

Kenneth E. Pevler
Manager, Regulatory Performance

Attachment

cc: C. Rushworth
E. Protsch
J. Franz
D. Wilson
R. Laufer (NRC-NRR)
J. Caldwell (Region III)
NRC Resident Office
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ALTERNATIVE TESTING NUMBER NDE-R033

SYSTEM/COMPONENT(S) FOR WHICH ALTERNATE EXAMINATION WILL BE USED

Code Classes: 1, 2, and 3
References: IWA-7000
ASME Code Case N-508-1
Examination Categories: N/A
Item Numbers: N/A
Description: Rotation of Serviced Snubbers and Pressure Relief Valves for the Purpose of Testing
Component Numbers: All Class 1, 2 and 3 Snubbers and Pressure Relief Valves Subject to Testing

CODE REQUIREMENT

IWA-7210(b) states "Any items to be used for replacement shall meet the following requirements unless the alternative of (c) below is adopted:

- (1) the applicable Construction Code to which the original item was constructed; and
- (2) the existing design requirements.

If the original item was constructed without Code requirements, the item to be used for replacement shall be in accordance with the design, fabrication, and examination requirements for the original item unless the alternative of (c) below is adopted."

BASIS FOR ALTERNATE EXAMINATION

Per ASME Section XI, the rotation of snubbers and relief valves is required to be treated as a Code replacement that must meet the requirements of IWA-7000. This necessitates the use of replacement programs and plans, review and concurrence by the ANII, and maintenance of NIS-2 forms or other Section XI documentation to record the replacement. Such controls are appropriate when items are replaced for the purpose of design changes, failures, or expiration of component life, but are excessive for the removal and installation of snubbers and relief valves solely for the purpose of testing.

The use of Code Case N-508-1 eliminates the inappropriate administrative controls and documentation requirements associated with an ASME Section XI replacement, while maintaining aspects such as design, manufacture, ASME Section XI pressure testing requirements, operational limits and settings.

Code Case N-508-1 does not alter any Section XI requirements if a removed item requires any repair or replacement of Code parts. As required by paragraph (i) of the Code Case, repair or

replacement of the removed item, when required, shall be performed in accordance with IWA-4000 for repairs and IWA-7000 for replacements. This ensures that, if the removed item requires the repair or replacement of a Code item, the activity will be tracked as a Section XI repair or replacement, and the required Section XI documentation will be generated.

The use of ASME Code Case N-508-1 as an alternative to IWA-7000 for the rotation of snubbers and relief valves for the purpose of testing provides a reduction in inappropriate administrative requirements and documentation. Technical requirements (e.g., design, fabrication, installation and testing) are still maintained in a manner that provides an acceptable level of quality and safety that is consistent with the criteria of ASME Section XI. Pursuant to 10CFR50.55a(a)(3)(i), authorization to use Code Case N-508-1 is requested on the basis that the proposed alternatives provide an acceptable level of quality and safety.

ALTERNATE EXAMINATION

As an alternative to existing Section XI requirements, the DAEC will implement the alternative requirements of Code Case N-508-1 when rotating snubbers and pressure relief valves for the purpose of testing.

ASME Code Case N-508-1, "Rotation of Serviced Snubbers and Pressure Relief Valves for the Purpose of Testing" provides alternative rules to those stated above for the purpose of testing snubbers and relief valves. The alternative requires the following:

- (a) Items being removed and installed shall be of the same design and construction;
- (b) Items being removed shall have no evidence of failure at the time of removal;
- (c) Items being rotated shall be removed and installed by mechanical means;
- (d) Items being installed shall previously have been in service;
- (e) Preservice inspections and pressure tests shall be performed as required by IWA-7000;
- (f) The Owner shall maintain a method of tracking the items to ensure traceability of inservice inspection and testing records;
- (g) Use of an NIS-2 form is not required except as provided in (i) below;
- (h) Testing of removed snubbers and pressure relief valves, including required sample expansions, shall be performed in accordance with the Owner's test program;
- (i) Repair or replacement of removed items, when required, shall be performed in accordance with IWA-4000 or IWA-7000.

APPLICABLE TIME PERIOD

Code Case N-508-1 will be utilized for the Third Interval Inservice Inspection Program.