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62 FR 52166
Oct. 6, 1997

WOLF CREEK

NUCLEAR OPERATING CORPORATION

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Gary D. Boyer
Chief Administrative Officer

January 29, 1998

CO 98-0006

U. S. Nuclear Regulatory Commission
Rules and Directives Branch
Office of Administration
Washington, DC 20555

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Subject: Docket No.50-482: Wolf Creek Nuclear Operating Corporation
Comments on Draft Regulatory Guide DG-1070

Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOC) has reviewed Draft Regulatory Guide, DG-1070, "Sampling Plans Used for Dedicating Simple Metallic Commercial Grade Items for Use in Nuclear Power Plants", dated September 1997, and the "Industry Comments on DG-1070", dated November 23, 1997, provided by Nuclear Electric Institute (NEI). Based on the review of these documents, WCNOC provides the following comments.

WCNOC endorses the NEI position concerning the Draft Regulatory Guide DG-1070 in regards to Industry Background, Performance History of Dedicated Commercial Grade Items, and the Regulatory Basis for Sampling During the Dedication Process. In addition, WCNOC strongly agrees with the position NEI has identified concerning the Cost of the Regulatory Guide Implementation.

The cost to implement the guidance provided on the Draft Regulatory Guide would be significant to WCNOC and the industry. The draft guide requires a tighter sampling size than most utilities and suppliers use on larger lots, and it specifies verification of overly conservative critical characteristics and acceptance criteria for simple metallic items. If implemented, increased costs would be created by the following:

- The man-hours required to complete additional testing will require adding personnel to staff.
- The procurement of additional test equipment to accommodate increased testing.
- Increased population of stock numbers and total stock to accommodate different levels of safety significance.
- The cost to revise current procurement engineering and dedication procedures to address revised sampling practices.
- The cost to revise all current dedication plans.
- The increased cost of items that were dedicated by approved 10 CFR 50, Appendix B suppliers who significantly increase sampling because they must assume items are intended for safety-significant applications.

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- Increased engineering resources to evaluate homogeneity of lot. There will also be increased costs to obtain the level of lot homogeneity the Draft Regulatory Guide requires for sampling.
- Many of the tests the NRC considers nondestructive, would actually be destructive for small simple metallic items. Therefore, a significant number of additional products would need to be procured.
- Increased off-site testing because many utilities and suppliers do not currently have all of the test equipment required to complete testing specified in the Draft Regulatory Guide.
- The time to complete dedication will be increased which may have an impact on parts availability to support plant operation or potentially become critical path during refueling outages.
- The cost of obtaining additional paperwork from suppliers (such as, Certified Material Test Reports, Certificates of Conformance, etc.).

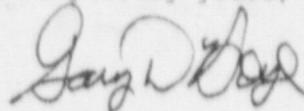
Nuclear utilities have self-initiated actions on two fronts to improve sampling in the dedication process. These initiatives are as follows:

- Nuclear Procurement Issues Committee (NUPIC) - Action to enhance the NUPIC checklist to provide additional guidance on ensuring that manufacturers have a technically justifiable sampling plan.
- Electric Power Research Institute (EPRI) - Action to develop a revision to EPRI document NP-7218 "Utilization of Sampling Plans for CGI Acceptance" to address the sampling sizes for destructive testing, consideration of safety function and safety significance when selecting a sample size and lot homogeneity considerations.

In conclusion, WCNOB believes that based on excellent performance history of dedicated commercial grade items, the current sampling programs utilized by utilities and 10 CFR 50, Appendix B manufacturers/suppliers are adequate to ensure safe operation of nuclear power plants. WCNOB believes that the sampling plans utilized are in accordance with current regulatory requirements and industry standards and that no additional guidance from the NRC is required. In addition, WCNOB believes that implementation of the recommendations provided in the Draft Regulatory Guide would significantly increase the cost of procurement without improving the quality of installed items.

If you have any questions concerning this matter please contact me at (316) 364-8831, extension 4450, or Mr. Michael J. Angus at extension 4077.

Very truly yours,



Gary D. Boyer

GDB/jad

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