Wolf Creek
Nuclear Operating Corporation

Stephen L. Smith
Engineering Vice President

October 1, 2020
ET 20-0011

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Reference: NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004

Subject: Docket No. 50-482: Request to Use a Provision of a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI

Commissioners and Staff:

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph(g)(4)(iv), and guidance provided in the Reference, Wolf Creek Nuclear Operating Corporation (WCNOC) requests Nuclear Regulatory Commission (NRC) approval to use a specific provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for Wolf Creek Generating Station (WCGS). Specifically, WCNOC requests approval to use IWA-4540(b) of 2017 Edition of the ASME B&PV Code. The Attachment to this letter provides WCNOC's request, including the basis for the proposed alternative.

WCNOC requests approval of this request by November 12, 2020.

There are no regulatory commitments contained in this submittal. If you have any questions concerning this matter, please contact me at (620) 364-4156, or Ron Benham at (620) 364-4204.

Sincerely,

Stephen L. Smith

SLS/rlt

Attachment: Request to Use a Provision of a Later Edition of the ASME B&PV Code, Section XI

cc: S. S. Lee, (NRC), w/a
S. A. Morris (NRC), w/a
N. O'Keefe (NRC), w/a
Senior Resident Inspector (NRC), w/a

Request to Use a Provision of a Later Edition of the ASME B&PV Code, Section XI

Proposed Use of Subsequent ASME Code Edition and Addenda in Accordance with 10 CFR 50.55a(g)(4)(iv)

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph(g)(4)(iv), and guidance provided in Reference 1, Wolf Creek Nuclear Operating Corporation (WCNOC) requests Nuclear Regulatory Commission (NRC) approval to use a specific provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for Wolf Creek Generating Station (WCGS). Specifically, WCNOC requests approval to use IWA-4540(b) of 2017 Edition of the ASME B&PV Code.

1. ASME Code Component(s) Affected

All Class 1, 2 and 3 items located in the ASME XI boundaries.

2. Requested Date for Approval

Approval requested by November 12, 2020.

3. Applicable Code Edition and Addenda

PLANT	ISI INTERVAL	EDITION	INTERVAL START	INTERVAL SCHEDULED END
WCGS, Unit 1	4	2007 Edition, through 2008 Addenda	9/3/2015	9/2/2025

4. Proposed Subsequent Code Edition and Addenda (or Portion)

WCGS performs Repair/Replacement activities in accordance with ASME Section XI, 2007 Edition through the 2008 Addenda.

Pursuant to 10 CFR 50.55a(g)(4)(iv), WCNOC requests permission to utilize IWA-4540(b) from the 2017 Edition. This subparagraph outlines items that are exempt from pressure testing after repair/replacement activities.

5. Related Requirements

10 CFR 50.55a(g)(4)(iv) states:

"Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject

to Commission approval. Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met."

10 CFR 50.55a(b)(2) incorporates by reference Section XI, Division 1, of the ASME B&PV Code 2017 Edition as approved in Reference 3, below. WCNOC is requesting to use of IWA-4540(b) of the 2017 Edition of ASME Section XI to utilize the exemptions listed. There are no related requirements or applicable conditions associated with this subparagraph, IWA-4540(b).

6. Duration of Request

The duration of this request will continue for the remainder of the site's current Inservice Inspection interval.

7. References

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004.

2. NRC Memorandum from D. Rudland (Senior Level Advisor, Division of New and Renewed Licenses) to Anna H. Bradford (Director, Division of New and Renewed Licenses), "Summary of the June 25, 2020, Public Meeting with the Nuclear Industry to Discuss Title 10 of the Code of Federal Regulations Section 50.55a(b)(2)(xxvi) Condition on the Pressure Testing of Class 1, 2, and 3 Mechanical Joints," dated July 8, 2020 (ADAMS Accession No. ML20189A286)

3. Federal Register, 85 FR 26540, dated May 4, 2020

8.. Precedents

Entergy Nuclear Operations, Inc., fleet Relief Request was reviewed and found to be comprehensive and applicable to WCNOC's request. Entergy submitted a Relief Request for their fleet on August 12, 2020 titled, "Relief Request EN-RR-20-002: Proposed Use of Subsequent ASME Code Edition and Addenda in Accordance with 10 CFR 50.55a(g)(4)(iv)." The NRC approved the Entergy Relief Request on August 18, 2020.