

Bart D. Withers President and Chief Executive Officer

December 14, 1989

WM 89-0256

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

Subject: Docket No. 50-482: Request for Use of ASME Code Case N-401-1

Gentlemen:

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PDR ADOCH 05000482

The purpose of this letter is to request that the Nuclear Regulatory Commission (NRC) authorize the use of ASME Section XI Code Case N-401-1 entitled "Eddy Current Examination, Section XI, Division 1" pursuant to 10 CFR 50.55a(a) (3) for Wolf Creek Generating Station. This Code Case revision was approved by the ASME Boiler and Pressure Vessel Code Committee on May 4, 1988.

Code Case N-401 was approved by the Code Committee on February 20, 1984 and is listed as an approved Code Case in Regulatory Guide 1.147. Code Case N-401 specifies that, when demonstrated equivalent to the Authorized Nuclear Inservice Inspector, digitized collection and storage of eddy current test data may be used as an alternative to magnetic tape and strip chart recording of eddy current test data required by Section XI, Division 1, Appendix IV. Code Case N-401-1 adds the requirements for calibration to the original provisions of Code Case N-401. Periodic calibration in accordance with IV-3000 is required only for analog elements of the digital eddy current data collection and storage equipment. This Code Case will allow the use of current equipment and practices used by eddy current testing contractors and provide appropriate calibration of digital eddy current data equipment. This Code Case provides an acceptable level of quality and safety when the Section XI requirements can not be met. A copy of this Code Case is attached to this letter.

Since Code Case N-401-1 is not currently listed in Regulatory Guide 1.147, Revision 7, as a Code Case endorsed by the NRC, Wolf Creek Nuclear Operating Corporation (WCNOC) requests approval of this Code Case by February 1, 1990. Approval by this date will allow WCNOC to use this Code Case during the fourth refueling outage which is scheduled to start on March 8, 1990.

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This Code Case was approved for use at Oconee, McGuire and Catawba Nuclear Stations in a letter dated February 25, 1989 from D. B. Matthews to H. B. Tucker of Duke Power Company. If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,

Bart D. Withers President and Chief Executive Officer

BDW/aem

Attachment

- cc: B. L. Bartlett (NRC), w/a
  - E. J. Holler (NRC), w/a
  - R. D. Martin (NRC), w/a
  - D. V. Pickett (NRC), w/a

## Attachment to WM 89-0256 Page 1 of 1

CASE N-401-1

## CASES OF ASME BOILER AND PRESSURE VESSEL CODE.

## Approval Date: May 4, 1988

See Numerical Index for expiration and any reaffirmation dates.

## Case N-401-1 Eddy Current Examination Section XI, Division 1

Inquiry: Is it permissible, as an alternative to the Section XI, Division 1, Appendix IV, requirement for magnetic tape and strip chart recording of eddy current test data, to use digitized collection and storage of data as the permanent record for eddy current examinations, and to what extent do the calibration requirements of IV-3000 apply?

Reply: It is the opinion of the Committee that, when demonstrated equivale at to the Authorized Nuclear Inservice Inspector, digitized collection and storage of eddy current test data may be used as an alternative to magnetic tape and strip chart recording of eddy current test data required by Section XI, Division 1, Appendix IV. Periodic calibration in accordance with IV-3000 is required only for the analog elements of the digital eddy current data collection and storage equipment.