

March 8, 2000

MEMORANDUM TO: File Center

FROM: Jack N. Donohew, Senior Project Manager, Section 2
Project Directorate IV and Decommissioning */RA/*
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: DISCUSSION OF 8-MINUTE OPERATOR ACTION (TAC NO. MA6969)
AND ORDER ISSUED FOR MERGER (TAC NO. MA3964) WITH THE
LICENSEE FOR WOLF CREEK GENERATING STATION.

Attached are two e-mails from Wolf Creek Nuclear Operating Corporation (WCNOC), the licensee for Wolf Creek Generating Station (WCGS). The two e-mails provide responses to questions concerning two active licensing actions for WCGS.

E-mail #1 concerns the order issued by the staff for the merger of two of the other licensees for WCGS. In the letter of February 2, 2000, the licensee stated the merger was terminated and requested that the order issued be vacated. In the e-mail, the licensee agreed that the order could stand until it expired at the date in the order (i.e., October 31, 2000).

E-mail #2 is the licensee's response to the request that they provide a summary of what the licensee stated in the conference call of February 8, 2000, on the 8-minute operator action to prevent the pressurizer going water solid and water going through the safety valves. This is addressed in the amendment for the pressurizer safety valves for the application dated October 21, 1999 (TAC No. MA6969).

Docket No. 50-482

Attachments: Two E-mails dated February 18, 2000,
from WCNOC

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From: Harris Karl A <kaharri@WCNOC.com>
To: "Jack Donohew" <jnd@nrc.gov>
Date: Fri, Feb 18, 2000 4:56 PM
Subject: Merger

Neither our lawyer nor Otto [Maynard] has a problem with the merger order dying its natural date. Is there anything else we need to do? Once the date goes by, what do we do?

From: Harris Karl A <kaharri@WCNOC.com>
To: "Jack Donohew" <jnd@nrc.gov>
Date: Fri, Feb 18, 2000 5:24 PM
Subject: Writeup

Jack,

Here is the revised write-up [on the discussions held on the 8-minute operator action in the application dated October 21, 1999]. Most of the comments have either been put in color. Call if you have any questions.

Tony

In telecons with the licensee, 2/8/00 and 2/9/00, the licensee indicated that all the actions required by operators to terminate an inadvertent SI are taken from the control room and all the required steps are in the plant's emergency operating procedure, which is based on Westinghouse Owner's Group Generic Guideline, E-0, "Reactor Trip or Safety Injection."

No changes were required to be made to the procedure steps for terminating an inadvertent SI as a result of decreasing the response time from 10 to 8 minutes. However, the licensee indicated that procedures were changed to put the SI termination in the E-0 portion of its procedures as a result of a corrective action for an issue on operator response times that was identified in 1998. This was necessary to allow SI to be reset and the BIT isolated prior to the pressurizer going solid. Deviations to the WOG guidelines were written and are contained in the associated background document for E-0. Previously, if E-0 was entered because of an inadvertent SI, the procedure flowpath used to reset SI and close the BIT valves took approximately 30 minutes. The licensee further stated that two crews, minimally staffed, validated that SI could be terminated within the reduced time limit of 8 minutes (performance times ranged from 5'56" to 4'19"). All crews have been trained on terminating inadvertent SI within the new 8 minute limit during their scheduled requalification training and, all crews were noted by the licensee to have performed successfully. Though the two crews used to validate the reduced time limit were aware of the scenario, the licensee did use a minimum crew staffing which resulted in performance times with significant margins available before exceeding the 8 minute limit. In addition, all crews demonstrated successful performance during requalification training. These results provide the staff with reasonable assurance that successful termination of an inadvertent SI should be achievable by Wolf Creek operators within the newly established 8 minute time limit. The licensee also determined that, "... the lower valve setting does not increase the probability

that an event will occur which will result in the valve opening... [and] the lower valve lift setting and increased tolerance has no significant effect on the PSA." Hence, the overall plant risk should not be adversely effected if operators failed to take the required actions within the new time limit.

CC: Claridge David L <daclari@WCNOC.com>