

WOLF CREEK NUCLEAR OPERATING CORPORATION

Richard A. Muench
Vice President Engineering

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ET 00-0019

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

- Reference:
- 1) Letter WM 96-0081, dated July 31, 1996, from N. S. Carns, WCNOG, to James M. Lieberman, USNRC
 - 2) Letter WO 96-0101, dated July 3, 1996, from O. L. Maynard, WCNOG, to USNRC
 - 3) Letter ET 97-0108, dated October 17, 1997, from R. A. Muench, WCNOG, to USNRC
 - 4) Letter WO 99-0081, dated September 10, 1999, from C. C. Warren, WCNOG, to the NRC.
- Subject: Docket No. 50-482: Changes to Two NRC Commitments

Gentlemen:

This letter is to inform you that Wolf Creek Nuclear Operating Corporation (WCNOG) is revising two NRC commitments.

The first commitment was made on March 28, 1996, during a public meeting and enforcement conference concerning the icing event at Wolf Creek Generating Station (WCGS). During that conference WCNOG committed to perform functional assessments of four risk-significant safety-related systems: Auxiliary Feedwater System (AFWS); Essential Service Water System (ESWS); Component Cooling Water System (CCWS); and the Residual Heat Removal System (RHRS). This commitment was restated, along with a schedule for completing these assessments, in Reference 1. Reference 1 also stated: "As part of WCNOG's commitment to excellence, refinements may be made, as deemed appropriate, to the corrective actions discussed in this letter."

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A second commitment, made in Reference 2, reiterated that WCNOG would assess the four safety-related systems listed in Reference 1, but further committed to assessing four non-safety-related systems: Feedwater (FW); Service Water (SW); Main Generator; and Main Turbine systems.

The functional assessments of the AFWS and FW systems (Self Assessment 96-011) and the ESWS and SW systems (Self Assessment 96-005) were completed on December 31, 1996, and June 30, 1997, respectively, with no safety concerns being identified. WCNOG estimates that six man-years were dedicated to the AFWS/FW self assessment, and that six man-years were dedicated to the ESWS/SW self assessment. Based on the findings of these detailed assessments, WCNOG revised the scheduled completion dates for the CCWS to Fuel Cycle 11, and RHRS to Fuel Cycle 12 in Reference 3.

Since that time, several activities have occurred which are prompting WCNOG to refine and modify the two commitments described above. An NRC Architect and Engineering (AE) inspection was performed at WCGS November, 1997, through January, 1998. The CCWS was thoroughly inspected at that time, with no safety or operability concerns being identified. The NRC also inspected the RHRS during the AE inspection, again with no significant issues being identified. Two Safety System Engineering Inspections (SSEIs) have also been performed at WCGS since 1996, both of which identified issues of low risk significance, with no safety implications. WCNOG estimates that eight man-years were dedicated to the AE inspection, and that two man-years were dedicated to the SSEI inspections.

Issues identified during these inspection activities are described as having no operability problems, or as being minor discrepancies. In the cases of cited issues, the NRC has evaluated WCNOG's corrective action program to be "appropriate to prevent recurrence."

The relative insignificance of previous findings, and the strength of the corrective action program, indicate that little benefit would be gained by performing a functional self assessment of the CCWS and the RHRS. WCNOG Engineering continues to review corrective action issues deemed worthy of closer scrutiny.

Based on the results of WCNOG's self assessments, the AE inspection and the SSEIs, WCNOG considers the first commitment (to assess the four safety-related systems) to be met. WCNOG does not expect that significant issues on the CCWS and RHRS would be identified during licensee functional assessments, since significant issues were not identified during the AE inspection nor during the two SSEIs.

The Updated Safety Analysis Report (USAR) program review was effective in identifying discrepancies and initiating license document change requests to validate and correct the USAR. This review, though not specifically targeting Engineering programs or systems, benefited the subject systems being discussed in this correspondence.

Because of the positive results of the completed review, assessments and inspections, the self assessments of the two remaining non-safety-related systems committed to in Reference 2 (the second commitment) are not going to be performed. However, as an indication of WCNOG's ongoing commitment to excellence through self-evaluation, WCNOG has previously

commitment to performing an Electrical Fire Hazards Analysis (EFHA) self assessment. This was previously committed to in LER 1999-009-00, Reference 4. The benefit gained from performing the EFHA on risk significant systems is sufficient to justify closing the commitment in Reference 2. These changes are an acceptable re-direction of resources to assure the continued safe operation of WCGS.

If you have any questions regarding these changes, please contact me at (316) 364-4034, or Mr. Tony Harris at (316) 364-4038.

Very truly yours,



Richard A. Muench

RAM/rlr

cc: J. N. Donohew (NRC)
W. D. Johnson (NRC)
E. W. Merschoff (NRC)
Senior Resident Inspector (NRC)