

# WOLF CREEK NUCLEAR OPERATING CORPORATION

Clay C. Warren  
Vice President Operations Support

DEC 8 2000

CO 00-0066

U. S. Nuclear Regulatory Commission  
Records Management Branch  
Information Management Division  
Office of the Chief Information Officer  
Washington, D. C. 20555

Subject: Docket No. 50-482: Request for Exception to 10CFR50.4 for  
Updates to the Final Safety Analysis Report

Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOC) periodically submits revisions to the updated Final Safety Analysis Report (FSAR) pursuant to 10CFR50.71(e) and in accordance with 10CFR50.4(b)(6). The updated FSAR copies have been provided in paper form as required by 10CFR50.4(c). However, 10CFR50.4(c) also allows the NRC to grant exceptions to these requirements. By this letter, WCNOC is requesting approval of an exception to permit future updates to the FSAR to be submitted in CD-ROM format in lieu of paper copies.

10CFR50.4(b)(6) currently requires the signed original and 10 copies of the updated FSAR, or replacement pages per 10CFR50.71(e), to be submitted to the NRC Document Control Desk, one copy to the appropriate Regional Office and one copy to the NRC Resident Inspector. 10CFR50.4(c) requires all copies to be in permanent form on unglazed paper. Currently, WCNOC submits the replacement pages for the updated FSAR. A signed original (a signed transmittal with the original set of replacement pages) and one copy are provided to the Document Control Desk. Additional copies are distributed as shown in the transmittal letter. It is WCNOC's intent to continue to provide the signed original transmittal letter to the NRC Document Control Desk and to substitute CD-ROMs for the sets of FSAR replacement pages. WCNOC also desires to have the option to continue to send the copies in paper form. It should be noted however, once the FSAR updates are sent on CD-ROMs, it is unlikely that WCNOC would again issue the paper copies since this would require reissuing the complete FSAR.

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Brenda Shelton  
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Therefore, WCNOG requests approval to submit the updated FSAR pursuant to 10CFR50.71(e) as follows:

- i. One signed original transmittal letter with one CD-ROM or one paper original to the Document Control Desk
- ii. Ten CD-ROMs or ten paper copies to the Document Control Desk
- iii. One CD-ROM or one paper copy to the Regional Administrator
- iv. One CD-ROM or one paper copy to the Senior Resident Inspector

This alternative is requested as an exception to the form of communications addressed by 10CFR50.4(c).

We intend to submit the CD-ROM copies as complete reissues of the updated FSAR (i.e., the updated FSAR will include the previous pages still applicable and the updated replacement pages) in the PDF file format, which can be read by utilizing available Adobe Acrobat Reader software.

The NRC is free to copy the CD-ROMs and make them available to members of the public.

This request is similar to previously docketed requests submitted by Florida Power Corporation dated May 21, 1998, Tennessee Valley Authority dated October 1, 1999, Entergy Operations Inc. dated February 22, 2000, and TXU Electric dated July 5, 2000, which were approved by the NRC via letters dated June 19, 1998, October 14, 1999, March 24, 2000, and August 8, 2000, respectively.

This exception request is needed by March 1, 2000 to accommodate the next WCNOG FSAR update which is due March 11, 2001.

This communication contains no new licensing basis commitments regarding WCNOG.

If you have any questions concerning this matter, please contact me at (316) 364-4485, or Mr. Tony Harris at (316) 364-4038.

Very truly yours,



Clay C. Warren

CCW/rlr

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