WOLF CREEK
NUCLEAR OPERATING CORPORATION

Richard A. Muench
Vice President Engineering & Information Services

MAR 22 2001

ET 01-0007

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, D. C. 20555

Subject: Docket No. 50-482: Revision to Technical Specification 5.5.11, "Ventilation Filter Testing Program (VFTP)"

Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOC) herewith transmits an application for amendment to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS).

This amendment application would revise Administrative Controls Technical Specifications (TS) 5.5.11, "Ventilation Filter Testing Program (VFTP)," specifically TS 5.5.11c., to change the penetration requirements for laboratory testing of the charcoal adsorber for the Control Room Emergency Ventilation System and Auxiliary/Fuel Building Emergency Exhaust System. The proposed changes to the methyl iodide penetration are consistent with the recommendations of Generic Letter 99-02, "Laboratory Testing of Nuclear- Grade Activated Charcoal."

The WCNOC Plant Safety Review Committee and the Nuclear Safety Review Committee have reviewed this amendment application. Attachments I through V provide the required affidavit, description of proposed license changes and assessment, existing marked-up TS page, revised TS page, and summary of regulatory commitments made in this submittal.

WCNOC requests approval of the proposed license amendment by August 31, 2001, with the amendment being implemented within 60 days of issuance of the license amendment. The approval date was administratively selected to allow for NRC review, but WCNOC does not require this amendment to allow continued safe full power operation.

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92. Pursuant to 10 CFR 51.22(b), no environmental assessment need be prepared in connection with the issuance of this amendment.

A001

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Kansas State Official. If you should have any questions regarding this submittal, please contact me at (620) 364-4034, or Mr. Tony Harris at (620) 364-4038.

Very truly yours,

Richard A. Muench

RAM/rlr
Attachments:
I - Affidavit
II - Description and Assessment
III - Markup of Technical Specification page
IV - Retyped Technical Specification page
V - List of Commitments

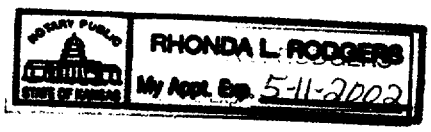
cc: V. L. Cooper (KDHE), w/a
J. N. Donohew (NRC), w/a
W. D. Johnson (NRC), w/a
E. W. Merschoff (NRC), w/a
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Richard A. Muench, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering and Information Services of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the contents thereof; that he has executed the same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By _____
Richard A. Muench
Vice President Engineering and Information Services

SUBSCRIBED and sworn to before me this 22 day of March, 2001.



Rhonda L. Rodgers
Notary Public

Expiration Date 5-11-2002

ATTACHMENT II

DESCRIPTION AND ASSESSMENT

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

1.1 This proposed License Amendment Request (LAR) is a request pursuant to 10 CFR 50.90 to revise Technical Specification (TS) 5.5.11c., "Ventilation Filter Test Program (VFTP)," for the Wolf Creek Generating Station (WCGS).

1.2 Updated Safety Analysis Report (USAR) Section

There are no changes to the USAR currently anticipated as a result of this LAR.

2.0 DESCRIPTION

The proposed License Amendment would revise Administrative Controls Technical Specifications (TS) 5.5.11, "Ventilation Filter Testing Program (VFTP)," specifically TS 5.5.11c., to change the penetration values for laboratory testing of the charcoal adsorber for the Control Room Emergency Ventilation System from 2% to 2.5% and the Auxiliary/Fuel Building Emergency Exhaust System from 2% to 5%. The proposed change also deletes the "≤" sign associated with the temperature for the laboratory test of a sample of the charcoal adsorber.

3.0 BACKGROUND

On June 3, 1999, the NRC issued Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal" (Reference 7.1), alerting licensees that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with their current licensing basis as it relates to the dose limits of General Design Criteria (GDC) 19 of Appendix A to 10 CFR Part 50, and subpart A of 10 CFR 100.

Safety related air-cleaning units used in the engineered safety feature ventilation systems of nuclear power plants reduce the potential for onsite and offsite consequences of a radiological accident by adsorbing radioiodine. Analyses of design basis accidents assume particular safety related charcoal adsorption efficiencies when calculating onsite (control room operator) and offsite doses. To ensure that the charcoal filters used in these systems will perform in a manner that is consistent with the licensing basis of a facility, most licensees have requirements in their facility TS to periodically test (in a laboratory) samples of charcoal taken from the air-cleaning units (Reference 7.1).

Generic Letter 99-02 requested that all licensees determine whether their TS referenced ASTM D3803-1989 for charcoal filter laboratory testing. Licensees whose TS did not reference ASTM D3803-1989 were requested to either amend their TS to reference ASTM D3803-1989 or propose an alternate test protocol. In Wolf Creek Nuclear Operating Corporation (WCNOC) letter ET 99-0032, Reference 7.2, WCNOC indicated that the WCGS TS require that nuclear-grade charcoal in the engineered safety feature systems be tested in accordance with the requirements of ASTM D3803-1989, and that no additional TS amendment or additional testing was required. The requirement to perform testing in accordance with ASTM D3803-1989 was incorporated into the TS by Amendment No. 102 (Reference 7.3).

The current test requirements for the laboratory testing of charcoal samples for WCGS are as follows:

Test Parameter	Control Room Emergency Ventilation System	Auxiliary/Fuel Building Emergency Exhaust System
Pressure	1 atm	1 atm
Temperature	30 ± 0.2°C	30 ± 0.2°C
Velocity	11.9 to 12.5 m/min.	11.9 to 12.5 m/min.
Relative Humidity	70%	70%
Methyl iodide Concentration	1.75 mg/m^3	1.75 mg/m^3
Bed Depth	50 ± 1 mm (≈ 2 in.)	50 ± 1 mm (≈ 2 in.)
Test Limit (Penetration)	2%	2%
Equilibration	2 hrs.	2 hrs.
Challenge	1 hr.	1 hr.
Elution	1 hr.	1 hr.
Test Standard	ASTM D3803-1989	ASTM D3803-1989
Exception to Standard	70% RH	70% RH

Generic Letter 99-02 allows plants that test to ASTM D3803-1989 to lower the safety factor for determining the acceptance criteria for charcoal filter efficiency. Amendment No. 102, which adopted the use of ASTM D3803-1989 did not revise the safety factor as currently allowed under Generic Letter 99-02. Therefore, this amendment request proposes to take advantage of the use of a lower safety factor.

4.0 TECHNICAL ANALYSIS

Generic Letter 99-02 allows relaxing the safety factor to 2 because the 1989 ASTM standard is a " .... more accurate and demanding test than older tests." The Generic Letter further states that the safety factor can be used for systems with or without humidity controls because the lack of humidity control is already accounted for in the test conditions. The WCGS Control Room Emergency Ventilation System and Auxiliary/Fuel Building Emergency Exhaust System have humidity controls. The Generic Letter indicates that the NRC has previously approved reductions in safety factors for plants adopting the 1989 standard on a case by case basis.

The Control Room Emergency Ventilation System includes the control room air conditioning units, the control room filtration units, and the control building pressurization units as shown in USAR Figure 9.4-1. The Control Room Emergency Ventilation System is designed to maintain the habitability of the control room during a design basis loss of coolant accident (LOCA) by creating a positive pressure envelope within the control room, by filtering the supply air to remove particles, and by providing charcoal adsorbers to remove iodines. This will ensure that

doses to control room personnel will be within the limits of General Design Criteria 19 of Appendix A to 10 CFR 50. One of the accident analysis assumptions (USAR Table 15A-1) utilized in the calculation that evaluated the potential radiological consequences to control room personnel from a LOCA was the filter decontamination efficiency of 95%. Reference 7.3 approved a penetration value of 2% based on the more stringent testing required by ASTM D3803-1989.

The Emergency Exhaust System serves both the auxiliary building and the fuel building as shown in USAR Figures 9.4-2 and 9.4-3. The Emergency Exhaust System filters airborne radioactive particulates from the area of the fuel pool following a fuel handling accident. Following a LOCA, the system is aligned to the auxiliary building; however, a limited amount of air from the fuel building is processed through the Emergency Exhaust System to prevent excessive negative pressure in the auxiliary building. One of the accident analysis assumptions utilized in the calculation that evaluated the potential radiological consequences to the general public from a LOCA and fuel handling accident was the filter decontamination efficiency of 90%. Reference 7.3 approved a penetration value of 2% based on the more stringent testing required by ASTM D3803-1989.

The proposed change revises the methyl iodide penetration acceptance value for the Control Room Emergency Ventilation System from 2% to 2.5%, and the penetration acceptance value for the Auxiliary/Fuel Building Emergency Exhaust System from 2% to 5%. The allowable penetration value is determined based on the following:

$$\text{Allowable Penetration} = \frac{[100\% - \text{methyl iodide efficiency* for charcoal credited in accident analysis}]}{\text{safety factor}}$$

* This value is the efficiency that was incorporated in the accident analysis which was reviewed and approved by the NRC in a safety evaluation.

The proposed penetration acceptance values of 2.5% for the Control Room Emergency Ventilation System and 5% for the Auxiliary/Fuel Building Emergency Exhaust System are calculated using the methyl iodide removal efficiencies credited in the WCGS accident analysis and a safety factor of 2. This safety factor is consistent with Generic Letter 99-02 and is acceptable when the charcoal is tested in accordance with ASTM D3803-1989 at 30°C (86°F) and 95% relative humidity (70% relative humidity with humidity control). ASTM D3803-1989 provides an accurate and realistic protocol for determining the capability of charcoal for ESF ventilation systems.

Technical Specification 5.5.11c. specifies that testing be in accordance with ASTM D3803-1989 at a temperature of $\leq$ 30°C. The guidance in Attachment 2, "Sample Technical Specification," provided in Generic Letter 99-02 indicate that the testing be performed in accordance with ASTM D3803-1989 at a temperature of 30°C. ASTM D3803-1989 specifically identifies that the testing is performed at a temperature of 30°C $\pm$ 0.2°C. As discussed in Generic Letter 99-02, testing at elevated temperatures results in an overestimation of the actual iodine-removal capability of the charcoal, and testing at 25°C or 30°C gives results that represent a more realistic assessment of the capability of the charcoal. As such, TS 5.5.11c. is revised to delete the inequality sign consistent with the guidance of Generic Letter 99-02.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

WCNOC has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10 CFR 50.92(c) as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No

   The proposed changes revise the allowable methyl iodide penetration percent for the carbon in the Control Room Emergency Ventilation System and the Auxiliary/Fuel Building Emergency Exhaust System when tested in accordance with ASTM D3803-1989. The proposed change is based on the values that would be derived using a safety factor of 2 between credited and tested carbon efficiencies. This use of a safety factor of 2 is discussed in Generic Letter 99-02. Generic Letter 99-02 allows the reduction of the safety factor between the credited and tested carbon efficiencies from 5 (for systems with heaters) and 7 (for systems without heaters) to 2 (for systems with or without heaters) when tested in accordance with ASTM D3803-1989. Analyses of design-basis accidents assume a particular charcoal filter adsorption efficiency when calculating offsite and control room operator doses. A test of the charcoal filter samples determines whether the filter adsorber efficiency is greater than that assumed in the design-basis accident analysis. The laboratory test acceptance criteria contain a safety factor to ensure that the efficiency assumed in the accident analysis is still valid at the end of the operating cycle. Because ASTM D3803-1989 is a more accurate and demanding test, the use a safety factor of 2 provides an acceptable adsorption efficiency greater than that assumed in the safety analysis.

   Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No

   The proposed changes revise the allowable methyl iodide penetration percent for the carbon in the Control Room Emergency Ventilation System and the Auxiliary/Fuel Building Emergency Exhaust System when tested in accordance with ASTM D3803-1989. The change in the allowable methyl iodide penetration percent is based on the values that would be derived using a safety factor of 2 as provided in Generic Letter 99-02. Generic Letter 99-02 allows the reduction of the safety factor between the credited and tested carbon efficiencies from 5 (for systems with heaters) and 7 (for systems without heaters) to 2 (for systems with or without heaters) when tested in accordance with ASTM D3803-1989. No new or different accident scenarios, transient precursors, failure mechanisms, or limiting single failures will be introduced as a result of using a safety factor of 2 and deletion of the inequality sign associated with the temperature at which testing occurs.

Therefore, the proposed changes do not create a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The charcoal adsorber sample laboratory testing protocol accurately demonstrates the required performance of the adsorbers in the Control Room Emergency Ventilation System and the Auxiliary Building Emergency Exhaust System following a design basis accident or in the Fuel Building Emergency Exhaust System following a fuel handling accident. The change in safety factor and deletion of the inequality sign associated with the temperature at which testing occurs will not affect system performance or operation. This use a safety factor of 2 is discussed in Generic Letter 99-02. Generic Letter 99-02 allows the reduction of the safety factor between the credited and tested carbon efficiencies from 5 (for systems with heaters) and 7 (for systems without heaters) to 2 (for systems with or without heaters) when tested in accordance with ASTM D3803-1989. Analyses of design-basis accidents assume a particular charcoal filter adsorption efficiency when calculating offsite and control room operator doses. A test of the charcoal filter samples determines whether the filter adsorber efficiency is greater than that assumed in the design-basis accident analysis. The laboratory test acceptance criteria contain a safety factor to ensure that the efficiency assumed in the accident analysis is still valid at the end of the operating cycle. Because ASTM D3803-1989 is a more accurate and demanding test, the use of a safety factor of 2 ensures the charcoal filter adsorption efficiency is greater than that assumed in the safety analysis when the penetration acceptance criterion is met. The offsite and control room dose analyses are not affected by this change and will remain within the limits of 10 CFR 100 and 10 CFR 50, Appendix A.

Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Based on the above evaluations, WCNOC concludes that the activities associated with the above described changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92 and accordingly, a finding by the NRC of no significant hazards consideration is justified.

5.2 Regulatory Safety Analysis

Applicable Regulatory Requirements/Criteria

1. 10 CFR Part 100 requires that radiological doses from normal operation and postulated accidents be acceptably low.

2. 10 CFR 50, Appendix A, GDC 19, requires that adequate radiation protection shall be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of 5 rem whole body, or its equivalent to any part of the body, for the duration of the accident.

3. NRC Regulatory Guide 1.52, "Design, Testing and Maintenance Criteria for Post Accident Engineered Safety Feature Atmosphere Cleanup System Air Filtration and Adsorption

Units of Light Water Cooled Nuclear Power Plants," provides methods acceptable to the NRC staff for implementing the NRC's regulations in Appendix A to 10 CFR 50 with regard to design, testing, and maintenance criteria for air filtration and adsorption units of engineered safety features atmospheric cleanup systems in light water coolant nuclear power plants.

4. NRC Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," was issued to alert nuclear power reactor licensees, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel, that the NRC has determined that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with the current licensing basis as it relates to the dose limits of 10 CFR 50, Appendix A, GDC 19 and 10 CFR 100, Subpart A. The Generic Letter requested that licensees determine whether their TS reference ASTM D3803-1989 for charcoal filter laboratory testing. Licensees whose TS did not reference ASTM D3803-1989 were requested to amend their TS to reference ASTM D3803-1989 or propose an alternative test protocol.

Analysis

Testing of the charcoal in accordance with ASTM D3803-1989 and Regulatory Guide 1.52 criteria and meeting the penetration acceptance criteria will assure that the radioiodine removal efficiencies assumed in the accident analysis would not be invalidated. Therefore, operation in accordance with the proposed change will continue to provide assurance that the dose requirements in 10 CFR Part 100, Subpart A and 10 CFR Part 50, Appendix A, GDC 19 are met.

Conclusion

Operation of the plant in accordance with the proposed change will be in compliance with the above regulatory requirements and is consistent with the guidance in Generic Letter 99-02.

6.0 ENVIRONMENTAL EVALUATION

WCNOC has determined that the proposed amendment would change requirements with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. WCNOC has evaluated the proposed change and has determined that the change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amount of effluent that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22 (c)(9). Therefore, pursuant to 10 CFR 51.22 (b), an environmental assessment of the proposed change is not required.

7.0 REFERENCES

7.1. Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," June 3, 1999, including errata issued August 23, 1999.

7.2. Letter ET 99-0032, "Wolf Creek Nuclear Operating Corporation's 180-Day Response to Generic Letter (GL) 99-02, 'Laboratory Testing of Nuclear-Grade Activated Charcoal,'" July 29, 1999.

7.3. NRC letter dated September 4, 1996, "Amendment No. 102 to Facility Operating License No. NPF-42 (TAC NO. M93950)."

8.0 PRECEDENTS

The proposed changes to the penetration acceptance values using a safety factor of 2 are consistent with the regulatory position in Generic Letter 99-02. There are precedents for revising the penetration acceptance values consistent with Generic Letter 99-02. The Southern Nuclear Operating Company operating licenses for Edwin I. Hatch Nuclear Plant, Units 1 and 2, have been amended to incorporate the application of a safety factor of 2. These amendments, Nos. 223 and 164, were issued on October 3, 2000.

ATTACHMENT III

MARKUP OF TECHNICAL SPECIFICATION PAGE

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal absorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2 at the system flowrate specified below ± 10%.

ESF Ventilation System	Flowrate
Control Room Emergency Ventilation System – Filtration	2000 cfm
Control Room Emergency Ventilation System-Pressurization	750 cfm
Auxiliary/Fuel Building Emergency Exhaust	6500 cfm

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal absorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and greater than or equal to the relative humidity specified below.

ESF Ventilation System	Penetration	RH
Control Room Emergency Ventilation System (Filtration/Pressurization)	2.5%	70%
Auxiliary/Fuel Building Emergency Exhaust	5%	70%

d. Demonstrate at least once per 18 months for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal absorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system flowrate specified below ± 10%.

ESF Ventilation System	Delta P	Flowrate
Control Room Emergency Ventilation System - Filtration	6.6 in. W.G.	2000 cfm
Control Room Emergency Ventilation System - Pressurization	3.6 in. W.G.	750 cfm
Auxiliary/Fuel Building Emergency Exhaust	4.7 in. W.G.	6500 cfm

(continued)

ATTACHMENT IV

RETYPED TECHNICAL SPECIFICATION PAGE

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal absorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2 at the system flowrate specified below ± 10%.

ESF Ventilation System	Flowrate
Control Room Emergency Ventilation System – Filtration	2000 cfm
Control Room Emergency Ventilation System-Pressurization	750 cfm
Auxiliary/Fuel Building Emergency Exhaust	6500 cfm

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal absorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and greater than or equal to the relative humidity specified below.

ESF Ventilation System	Penetration	RH
Control Room Emergency Ventilation System (Filtration/Pressurization)	2.5%	70%
Auxiliary/Fuel Building Emergency Exhaust	5%	70%

d. Demonstrate at least once per 18 months for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal absorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system flowrate specified below ± 10%.

ESF Ventilation System	Delta P	Flowrate
Control Room Emergency Ventilation System - Filtration	6.6 in. W.G.	2000 cfm
Control Room Emergency Ventilation System - Pressurization	3.6 in. W.G.	750 cfm
Auxiliary/Fuel Building Emergency Exhaust	4.7 in. W.G.	6500 cfm

(continued)

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

e. Demonstrate at least once per 18 months that the heaters for each of the ESF systems dissipate the value specified below when tested in accordance with ANSI N510-1975.

ESF Ventilation System	Wattage
Control Room Emergency Ventilation System - Pressurization	5 ± 1 kW
Auxiliary/Fuel Building Emergency Exhaust	37 ± 3 kW

f. Demonstrate at least once per 18 months for each of the ESF systems that following the creation of an artificial Delta P across the combined HEPA filters, the prefilters, and the charcoal absorbers of not less than the value specified below (dirty filter conditions), that the flowrate through these flow paths is with ± 10% of the value specified below when tested in accordance with ANSI N510-1980.

ESF Ventilation System	Delta P	Flowrate
Control Room Filtration System	6.6 in. W.G.	2000 cfm
Control Room Pressurization System	3.6 in. W.G.	750 cfm
Auxiliary/Fuel Building Emergency Exhaust	4.7 in. W.G.	6500 cfm

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.12 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the Waste Gas Holdup System, the quantity of radioactivity contained in gas storage tanks, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks. The gaseous radioactivity quantities shall be determined following the methodology in Branch Technical Position (BTP) ETSB 11-5, Revision 0, July 1981, "Postulated Radioactive Release due to Waste Gas System Leak or Failure." The liquid radwaste quantities shall be determined in accordance with Standard Review Plan, Revision 2, July 1981, Section 15.7.3, "Postulated Radioactive Release due to Tank Failures."

(continued)

LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Tony Harris, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4038.

COMMITMENT	Due Date/Event
The amendment will be implemented within 60 days of issuance of the license amendment.	Within 60 days of issuance of the license amendment