

June 8, 2001

MEMORANDUM FOR: Docket File

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

SUBJECT: RESPONSES TO QUESTIONS ON LICENSEE APPLICATION  
REGARDING LICENSE AMENDMENT REQUEST INVOLVED WITH  
PRESSURIZER PRESSURE ALLOWABLE VALUES FOR WOLF  
CREEK GENERATING STATION (TAC NO. MB1612)

Attached is an e-mail providing responses from Wolf Creek Nuclear Operating Corporation (the licensee) regarding questions on its application of March 22, 2001 (ET 01-0012) that requested changes to the pressurizer pressure allowable values in Tables 3.3.1-1 (functions 8.a and 8.b) and 3.3.2-1 (function 1.d) of the technical specifications for the Wolf Creek Generating Station.

The responses clarify statements made in the licensee's application, do not expand the scope of the application as noticed, and do not change the staff's original proposed no significant hazards consideration determination published in the *Federal Register* on May 16, 2001 (66 *FR* 27178).

Docket No. 50-482

Enclosure: E-mail dated June 1, 2001

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**ACCESSION NUMBER: ML011570432**      NRR-106

OFFICE	PDIV-2/PM	PDIV-2/LA	PDIV-2/SC
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DATE	6/8/2001	6/8/01	6/8/01

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EMAIL DATED JUNE 1, 2001

**From:** Wideman Steven G <stwidem@WCNOC.com>  
**To:** "Donohew Jack" <JND@nrc.gov>  
**Date:** 6/1/01 7:31AM  
**Subject:** FW: Questions for Pressurizer Pressure Allowable Values LAR

Jack - provided below are responses to the two questions e-mailed to Wolf Creek on 5/25/01.

1. Has the NRC staff reviewed and approved the methodologies in TR 89-001 to account for instrument error, process uncertainties, instrument drift, and calibration accuracy for engineered safety feature actuation system instrumentation? If so, where is this approval documented?

Response: In March of 1977, the NRC requested several utilities with Westinghouse Nuclear Steam Supply Systems to reply to a series of questions concerning the methodology for determining instrument setpoints. A statistical methodology was developed in response to those questions with a corresponding defense of the technique used in determining the overall allowance for each setpoint. This technique, or other similar approaches of a similar nature, have been used in WCAP-9180, "Consideration of Uncertainties in the Specification of Core Hot Channel Factor Limits, " and WCAP-8567, "Improved Thermal Design Procedure." WCAP-8567 has been approved by the NRC Staff and thus noting the acceptability of statistical techniques for the application requested. Wolf Creek had Westinghouse develop the setpoint methodology based on a statistical methodology and this was transmitted to Wolf Creek from Westinghouse by letter SNP (KG)-492 on August 24, 1984 [(this date was corrected to August 29, 1984, which is the date stated at the end of the next paragraph for the same letter, in a call on June 4, 2001)]. The Technical Specification Trip Setpoint and Allowable Values issued with the Operating License were based on letter SNP (KG)-492, as such, it can be considered that the methodology was approved with the issuance of the Technical Specification on June 4, 1985.

In 1989, WCNOC started performing its own core design which included the RPS and ESFAS setpoint calculations. The topical report, TR 89-001, "WCNOC Nuclear Safety Analysis Setpoint Methodology for the Reactor Protection System," was developed as a Wolf Creek document for providing the methodology for performing of setpoint analysis. TR 89-001, was developed based on letter SNP (KG)-492, "Wolf Creek Setpoint Methodology Report," dated August 29, 1984 from Westinghouse.

The TS Bases in Section 3.3.1 and 3.3.2 provides some discussion concerning the setpoint methodology. The referencing of TR 89-001 was also discussed with Carl Schulten of the TS Branch during the review of the Wolf Creek [Improved Technical Specifications (ITS)] Conversion application. Letter ET 99-0010 (dated March 5, 1999), additional item WC 3.3-020 (1) provided changes to the TS Bases based on discussion with the reviewer (Carl Schulten) on 2/22/99 concerningreferencing the setpoint methodology. [The ITS Conversion was approved for Wolf Creek in Amendment No. 123 issued March 31, 1999.]

2. What is the topical report and staff evaluation approving response time testing for the replacement Rosemount Model 1154 transmitters for WCGS? Of the acceptable methods to establish the response time for these transmitters given in the staff's safety evaluation, which method is being used to establish the response time of less than or equal to 200 msec for the Rosemount Model 1154 transmitters?

Response: License Amendment No. 113 dated October 20, 1997, approved the allocation of sensor response times based on WCAP-13632-P-A, Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirements." WCAP-13632 provides the basis and methodology for using allocated sensor response times in the overall verification of the channel response time for specific sensors.

The Safety Evaluation associated with Amendment No. 113 states, in part:

"First, the staff's SER stated that licensees referencing WCAP-13632 must perform a hydraulic RTT prior to installation of a new transmitter/switch or following refurbishment of the transmitter/switch to determine an initial sensor-specific response time value. In response, the Wolf Creek licensee stated that applicable plant surveillance test procedures stipulate that allocations for pressure sensor response times must be verified by performance of an appropriate RTT prior to placing a sensor in operational service and reverified following maintenance that may adversely affect sensor response time, such as replacing the sensing assembly of a transmitter. When sensor RTT is required, the resultant pressure sensor response times will be documented in the plant procedure data packages. The staff finds this response acceptable as it satisfactorily addresses action item 1 of the staff's SER approving WCAP-13632, Rev. 2."

Therefore, the replacement transmitters would be response time tested prior to installation to verify that the response time is less than the vendor specified response time of less than or equal to 200 msec.

The information contained in this electronic correspondence is informally submitted to the NRC and is not considered to be docketed by Wolf Creek Nuclear Operating Corporation (WCNOC). Should the NRC wish to assign a docket number to this correspondence, WCNOC requests it be contact to obtain concurrence.

Steve Wideman  
WCNOC Licensing  
phone: 620-364-4037  
fax: 620-364-4138  
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> -----

> From: Jack Donohew[SMTP:JND@nrc.gov]  
> Sent: Friday, May 25, 2001 8:02 AM  
> To: kehall@wcnoc.com; stwidem@wcnoc.com  
> Subject: Questions for Pressurizer Pressure Allowable Values LAR  
>  
> <<WordPerfect 6.1>>  
> Attached is the file with two questions on the application dated March 22,  
> 2001 (ET 01-0012). <JND>

>

>

**CC:** Coates Thomas W <thcoate@WCNOC.com>, Patel Jitesh K <jipatel@WCNOC.com>, Mac-Taggart Verl J <vemacta@WCNOC.com>, Stamm John D <jostamm@WCNOC.com>, Hall Kenneth W <kehall@WCNOC.com>, Harris Karl A <kaharri@WCNOC.com>