

December 4, 2002

Mr. Otto L. Maynard  
President and Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
Post Office Box 411  
Burlington, KS 66839

SUBJECT: WOLF CREEK GENERATING STATION - RESPONSE TO NRC BULLETIN  
2002-02, "REACTOR PRESSURE VESSEL HEAD AND VESSEL HEAD  
PENETRATION NOZZLE INSPECTION PROGRAMS" (TAC NO. MB5938)

Dear Mr. Maynard:

On August 9, 2002, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs." The Bulletin requested addressees to provide information related to their reactor pressure vessel (RPV) head and vessel head penetration (VHP) nozzle inspection programs for their respective facilities, including a summary discussion of inspection program plans to supplement their required visual inspections with non-visual nondestructive examination methods, or justification for reliance on visual examinations as the primary method to detect degradation. Addressees were requested to respond to Item (1) of the Bulletin within 30 days of its issuance, or within 15 days of its issuance, to provide an alternative course of action, including the basis for acceptability of the proposed action.

By letter dated September 11, 2002 (ET 02-0037), you provided a response to Item (1) of the Bulletin, providing your plans to perform RPV head and VHP nozzle inspections at Wolf Creek. The response also indicated that the plant is in the category of plants considered to have low susceptibility to RPV head and VHP cracking, based on a susceptibility ranking of less than 8 effective degradation years (EDY). Specifically, you stated that Wolf Creek had 2.4 EDY as of September 9, 2002, in accordance with the Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) Report MRP-48.

The NRC staff has reviewed your response to Item (1) of the Bulletin. In that response, you stated a 100% bare metal visual examination of the RPV head (i.e., 100% of the carbon steel surface and 100% of the interface area between the head penetrations and the carbon steel on top of the head) was performed during Refueling Outage No. 12, which was conducted in April 2002. The staff finds that this inspection provides reasonable assurance that existing regulatory requirements are met, and there is adequate protection of public health and safety.

The staff notes that your justification for reliance on visual examinations and long-term inspection plans relies on the EPRI MRP inspection plan for pressurized water reactor RPV upper head penetrations. In your letter dated September 11, 2002, you committed to conduct a MRP inspection plan "supplemental visual examination" in Refueling Outage No. 14, which is currently scheduled for Spring 2005, and to submit the inspection scope and results within 30 days after plant restart from that outage. Because the staff has not completed its review of the MRP inspection plan, it has not made a determination on the adequacy of the program for ensuring applicable regulatory requirements are met. Therefore, the staff's assessment of your

Mr. Otto L. Maynard

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justification and the adequacy of your long-term inspection program plans will be determined upon completion of the staff's review of the MRP proposed inspection plan.

Also, Item (2) of Bulletin 2002-02 requested that you report to the Commission your inspection scope and results within 30 days after plant restart following the next inspection of the RPV head and VHP nozzles. The inspection conducted in Refueling Outage No. 12 was conducted in response to Bulletin 2002-01 and the results of that inspection were submitted May 24, 2002 (CT 02-0029). The staff finds that your report submitted in response to Item 2.A of Bulletin 2002-01 satisfies the report requested in Item (2) of Bulletin 2002-02.

If you have any questions on this issue or this letter, contact me at (301) 415-1307.

Sincerely,

*/RA/*

Jack Donohew, Senior Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-482

cc: See next page

justification and the adequacy of your long-term inspection program plans will be determined upon completion of the staff's review of the MRP proposed inspection plan.

Also, Item (2) of Bulletin 2002-02 requested that you report to the Commission your inspection scope and results within 30 days after plant restart following the next inspection of the RPV head and VHP nozzles. The inspection conducted in Refueling Outage No. 12 was conducted in response to Bulletin 2002-01 and the results of that inspection were submitted May 24, 2002 (CT 02-0029). The staff finds that your report submitted in response to Item 2.A of Bulletin 2002-01 satisfies the report requested in Item (2) of Bulletin 2002-02.

If you have any questions on this issue or this letter, contact me at (301) 415-1307.

Sincerely,

*/RA/*

Jack Donohew, Senior Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-482

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Wolf Creek Generating Station

cc:

Jay Silberg, Esq.  
Shaw, Pittman, Potts & Trowbridge  
2300 N Street, NW  
Washington, D.C. 20037

Vice President Operations  
Wolf Creek Nuclear Operating Corporation  
P.O. Box 411  
Burlington, KS 66839

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

Superintendent Licensing  
Wolf Creek Nuclear Operating Corporation  
P.O. Box 411  
Burlington, KS 66839

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 311  
Burlington, KS 66839

U.S. Nuclear Regulatory Commission  
Resident Inspectors Office  
8201 NRC Road  
Steedman, MO 65077-1032

Chief Engineer  
Utilities Division  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

Office of the Governor  
State of Kansas  
Topeka, KS 66612

Attorney General  
Judicial Center  
301 S.W. 10th  
2nd Floor  
Topeka, KS 66612

County Clerk  
Coffey County Courthouse  
Burlington, KS 66839

Vick L. Cooper, Chief  
Radiation Control Program, RCP  
Kansas Department of Health  
and Environment  
Bureau of Air and Radiation  
1000 SW Jackson, Suite 310  
Topeka, KS 66612-1366