



Terry J. Garrett
Vice President Engineering

April 19, 2005
ET 05-0002

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

Reference: 1) Letter ET 05-001 dated April 18, 2005, from T. J. Garrett,
WCNOC, to USNRC

Subject: Docket No. 50-482: Supplement to Exigent Request for Revision
to Technical Specification (TS) 5.5.9, "Steam Generator (SG)
Tube Surveillance Program"

Gentlemen:

Reference 1 transmitted an application for amendment to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station. The license amendment application proposed a one time revision to Technical Specification (TS) 5.5.9, "Steam Generator (SG) Tube Surveillance Program," to incorporate changes in the steam generator inspection scope during Refueling Outage 14 and the subsequent operating cycle. The proposed changes modify the inspection requirements for portions of steam generator tubes within the hot leg tubesheet region of the steam generators.

TS 5.5.9d.1.f), "Plugging Limit," defines the imperfection depth at or beyond which the tube shall be removed from service by plugging. The change requested in Reference 1 proposed to revise the existing acceptance criterion by inserting the following:

"During Refueling Outage 14, this criterion does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging. During Refueling Outage 14 and the subsequent operating cycle, all tubes with degradation identified in the portion of the tube within the region from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be removed from service;"

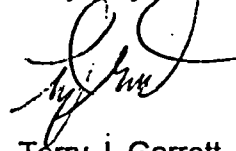
In discussions with the NRC staff on April 18, 2005, it was identified that the criterion would apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet in the subsequent operating cycle and could present a concern should a mid-cycle shutdown of the unit be required. Therefore, WCNOG proposes to revise TS 5.5.9d.1.f) as follows (note that the requested change has been emphasized in bold type face):

"During Refueling Outage 14 and the subsequent operating cycle, this criterion does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging. During Refueling Outage 14 and the subsequent operating cycle, all tubes with degradation identified in the portion of the tube within the region from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be removed from service;"

Attachment I contains the proposed revision to TS 5.5.9d.1 f) and replaces pages 4 of 5 and 5 of 5 in Attachment II of Reference 1. Attachment II contains the retyped technical specification page. The other TS changes requested in Reference 1 are not affected by this supplemental submittal. This supplemental information does not impact the supporting analysis or the conclusions of the No Significant Hazards Consideration provided in Reference 1.

In accordance with 10 CFR 50.91, a copy of this supplement, with attachments, is being provided to the designated Kansas State official. There are no commitments associated with this submittal. Please contact me at (620) 364-4084 or Mr. Kevin Moles at (620) 364-4126 for any questions you may have regarding this application.

Very truly yours,



Terry J. Garrett


TJG/rlg

Attachments: I - Markup of Technical Specification pages
II - Retyped Technical Specification page

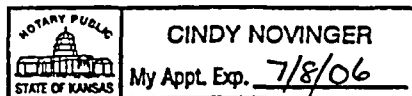
cc: V. L. Cooper (KDHE), w/a
J. N. Donohew (NRC), w/a
D. N. Graves (NRC), w/a
B. S. Mallett (NRC), w/a
Senior Resident Inspector (NRC), w/a

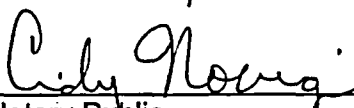
STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Terry J. Garrett, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering 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 
Terry J. Garrett
Vice President Engineering

SUBSCRIBED and sworn to before me this 19th day of April, 2005.




Notary Public


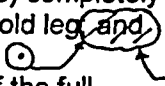
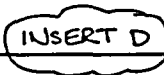
Expiration Date 7/8/06

ATTACHMENT I
MARKUP OF TECHNICAL SPECIFICATION PAGES

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Tube Surveillance Program (continued)

below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections;

- b) Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube;
- c) Degraded Tube means a tube containing imperfections greater than or equal to 20% of the nominal wall thickness caused by degradation;
- d) % Degradation means the percentage of the tube wall thickness affected or removed by degradation;
- e) Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective;
- f) Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service and is equal to 40% of the nominal tube wall thickness. 
- g) Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of a Double Design Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 5.5.9.c.3.c, above;
- h) Tube Inspection means an inspection of the steam generator tube from the tube end (hot leg side) completely around the U-bend to the top support of the cold leg and 
- i) Preservice Inspection means an inspection of the full length of each tube in each steam generator performed by eddy current techniques prior to service to establish a baseline condition of the tubing. This inspection shall be performed after the field hydrostatic test and prior to initial Power Operation using the equipment and techniques expected to be used during subsequent inservice inspections ; and

(continued)

INSERT B

During Refueling Outage 14 and the subsequent operating cycle, this criterion does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging. During Refueling Outage 14 and the subsequent operating cycle, all tubes with degradation identified in the portion of the tube within the region from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be removed from service;

INSERT C

During Refueling Outage 14 and the subsequent operating cycle, the portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded;

INSERT D

- j) During Refueling Outage 14 and the subsequent operating cycle:

Bulge refers to a tube diameter deviation within the tubesheet of 18 volts or greater as measured by bobbin probe; and

Overexpansion refers to a tube diameter deviation within the tubesheet of 1.5 mils or greater as measured by bobbin probe.

ATTACHMENT II
RETYPE TECHNICAL SPECIFICATION PAGE

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Tube Surveillance Program (continued)

- a) Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections;
- b) Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube;
- c) Degraded Tube means a tube containing imperfections greater than or equal to 20% of the nominal wall thickness caused by degradation;
- d) % Degradation means the percentage of the tube wall thickness affected or removed by degradation;
- e) Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective;
- f) Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service and is equal to 40% of the nominal tube wall thickness. During Refueling Outage 14 and the subsequent operating cycle, this criterion does not apply to degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet. Degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging. During Refueling Outage 14 and the subsequent operating cycle, all tubes with degradation identified in the portion of the tube within the region from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be removed from service;
- g) Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of a Double Design Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 5.5.9.c.3.c, above;

(continued)
