

March 21, 2006

Mr. Rick A. Muench  
President and Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
Post Office Box 411  
Burlington, KS 66839

SUBJECT: WOLF CREEK GENERATING STATION - RELIEF REQUESTS FOR THE THIRD  
10-YEAR PUMP AND VALVE INSERVICE TESTING PROGRAM (TAC NOS.  
MC8210, MC8212, MD0383, AND MD0384)

Dear Mr. Muench:

By letter dated August 23, 2005 (ET 05-0008), Wolf Creek Nuclear Operating Corporation proposed alternatives to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) for the third 10-year inservice testing (IST) program interval at Wolf Creek Generating Station (WCGS). This is Relief Requests (RRs) 3PR-01, 3PR-02, 3PR-03, 3PR-04, and 3VR-01. RR 3PR-04 will be addressed in future correspondence. RRs 3PR-01, 3PR-02, 3PR-03, and 3VR-01 are addressed in this letter.

Based on the enclosed safety evaluation, RRs 3PR-01, 3PR-02, and 3PR-03 are authorized pursuant to Paragraph 50.55a(a)(3)(i) of Title 10 of the *Code of Federal Regulations* on the basis that the proposed alternatives provide an acceptable level of quality and safety, and RR 3VR-01 is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) based on the determination that compliance with the specified ASME OM Code requirements results in hardship or unusual difficulty without a compensating increase in the level of quality and safety. These RRs are authorized for the third 10-year IST program interval at WCGS.

Sincerely,

**/RA/**

David Terao, Chief  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosure: Safety Evaluation

cc w/encl: See next page

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Based on the enclosed safety evaluation, RRs 3PR-01, 3PR-02, and 3PR-03 are authorized pursuant to Paragraph 50.55a(a)(3)(i) of Title 10 of the *Code of Federal Regulations* on the basis that the proposed alternatives provide an acceptable level of quality and safety, and RR 3VR-01 is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) based on the determination that compliance with the specified ASME OM Code requirements results in hardship or unusual difficulty without a compensating increase in the level of quality and safety. These RRs are authorized for the third 10-year IST program interval at WCGS.

Sincerely,  
**/RA/**  
David Terao, Chief  
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Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosures: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO THE INSERVICE TESTING PROGRAM, THIRD 10-YEAR INTERVAL  
WOLF CREEK NUCLEAR OPERATING CORPORATION  
WOLF CREEK GENERATING STATION  
DOCKET NO. 50-482

1.0 INTRODUCTION

By letter dated August 23, 2005, the Wolf Creek Nuclear Operating Corporation (licensee) submitted Relief Requests (RRs) 3PR-01, 3PR-02, 3PR-03, and 3VR-01 for the third 10-year inservice testing (IST) program interval at Wolf Creek Generating Station (WCGS). The licensee requested relief from certain IST requirements of the 1998 Edition through 2000 Addenda of the American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code). The licensee stated that the third 10-year IST interval for WCGS commenced on September 4, 2005.

2.0 REGULATORY EVALUATION

Section 55a of Part 50 to Title 10 of the *Code of Federal Regulations* (10 CFR) requires that IST of certain ASME Code Class 1, 2, and 3 pumps and valves be performed at 120-month (10-year) IST program intervals in accordance with the specified ASME OM Code incorporated by reference in the regulations, except where alternatives have been authorized or relief has been requested by the licensee and granted by the Nuclear Regulatory Commission (NRC or the Commission) pursuant to Paragraphs (a)(3)(i), (a)(3)(ii), or (f)(6)(i) of 10 CFR 50.55a. In accordance with 10 CFR 50.55a(f)(4)(ii), licensees are required to comply with the requirements of the latest edition and addenda of the ASME Code incorporated by reference in the regulations 12 months prior to the start of each 120-month IST program interval. In accordance with 50.55a(f)(4)(iv), IST of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in 10 CFR 50.55a(b), subject to NRC approval.

Portions of editions or addenda may be used provided that all related requirements of the respective editions and addenda are met. In proposing alternatives or requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for the facility. Section 50.55a authorizes the Commission to approve alternatives and to grant relief from ASME OM Code requirements upon making necessary findings. The NRC guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," dated April 3, 1989, provides alternatives to ASME OM Code requirements which

are acceptable. Further guidance is given in GL 89-04, Supplement 1, dated April 4, 1995, and NUREG-1482, Revision 1, "Guidance for Inservice Testing at Nuclear Power Plants," dated January 2005.

### 3.0 TECHNICAL EVALUATION

The NRC's findings with respect to granting or denying the IST program RRs 3PR-01, 3PR-02, 3PR-03, and 3VR-01 are given below:

#### 3.1 Pump Relief Request 3PR-01

##### 3.1.1 Code Requirements

The licensee requested relief from ISTB-3510(b)(1), which requires that the full-scale range of each analog instrument not exceed three times the reference value. Relief was requested for the discharge pressure gauge associated with the following pumps:

PEJ01A, Residual Heat Removal (RHR) Pump A  
PEJ01B, Residual Heat Removal (RHR) Pump B

##### 3.1.2 Licensee's Basis for Requesting Relief

The licensee stated that pump discharge pressure is used along with pump suction pressure to determine pump differential pressure. The installed discharge pressure gauge range of the RHR pumps is 0 to 700 pounds per square inch gauge (psig). The reference values for discharge pressure during IST are between 200 psig and 300 psig. Based on the requirements in ISTB-3510(b)(1), this would require as a maximum, a gauge with a range of 0 to 600 psig to bound the lowest reference value for pressure. Applying the accuracy requirement of plus or minus 2 percent for the quarterly pump test, the resulting inaccuracies due to pressure effects would be plus or minus 12.0 psig.

The licensee stated that the installed discharge pressure gauge will be calibrated to less than plus or minus 2 percent such that the inaccuracies due to pressure will be less than that required by the ASME OM Code (i.e., 12.0 psig), and use of the installed pressure gauge calibrated to less than plus or minus 2 percent is equivalent in terms of measuring differential pressure. Although the permanently installed discharge pressure gauges are above the maximum range limits of the ASME OM Code, they are within the accuracy requirements and are, therefore, suitable for use.

The licensee concluded that using the provisions of this relief request as an alternative to the specific requirements of ISTB-3510(b)(1) will provide adequate indication of pump performance and continue to provide an acceptable level of quality and safety.

### 3.1.3 Licensee's Proposed Alternative Testing

For the quarterly RHR pump test, the installed discharge pressure gauge calibrated to less than plus or minus 2 percent such that the inaccuracies due to pressure will be less than that required by the ASME OM Code will be used to determine pump discharge pressure.

### 3.1.4 Evaluation

The licensee requested relief from the ASME OM Code instrumentation requirements of ISTB-3510(b)(1) for pressure gauges which are used to measure discharge pressure of the RHR pumps. ISTB-3510(b)(1) requires that the full range of each instrument be no greater than three times the reference value. The licensee proposes to use instrumentation which does not meet the Code requirements.

The installed discharge pressure gauge range of the RHR pumps is 0 to 700 psig. The reference values for discharge pressure during IST are between 200 psig and 300 psig. Based on the requirements in ISTB-3510(b)(1), this would require as a maximum, a gauge with a range of 0 to 600 psig to bound the lowest reference value for pressure. Applying the accuracy requirement of plus or minus 2 percent for quarterly pump testing, the resulting inaccuracies due to pressure effects would be plus or minus 12.0 psig.

The installed discharge pressure gauge will be calibrated to less than plus or minus 2 percent such that the inaccuracies due to pressure will be less than that required by the ASME OM Code (i.e., 12.0 psig), and use of the installed pressure gauge calibrated to less than plus or minus 2 percent is equivalent in terms of measuring discharge pressure. Although the permanently installed discharge pressure gauges are above the maximum range limits of the ASME OM Code, the gauges are within the accuracy requirements and are, therefore, suitable for use.

The use of the existing discharge pressure gauge is supported by NUREG-1482, Paragraph 5.5.1, which states that when the combination of range and accuracy yields a reading at least equivalent to the reading achieved from instruments that meet the ASME OM Code requirements, relief may be granted by the NRC staff. This authorization does not apply to digital instrumentation.

The existing pump discharge pressure gauges yield readings at least equivalent to the readings achieved from gauges that meet ASME OM Code requirements, and, thus, provide an acceptable level of quality and safety for quarterly Group A or B pump testing activities, which includes RHR pumps.

### 3.1.5 Conclusion

Based on the above evaluation, the NRC staff concludes that the licensee's proposed alternative in RR 3PR-01 is authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the proposed alternative provides an acceptable level of quality and safety for quarterly Group A or B pump testing activities, which includes the RHR pumps. The licensee's proposed alternative

provides reasonable assurance of the operational readiness of the RHR pumps. This alternative is authorized for the third 10-year IST interval.

### 3.2 Pump Relief Request 3PR-02

#### 3.2.1 Code Requirements

The licensee requested relief from ISTB-3510(b)(1), which requires that the full-scale range of each analog instrument not exceed three times the reference value. Relief was requested for the suction pressure gauge associated with the following pumps:

PBG05A, Centrifugal Charging Pump A  
PBG05B, Centrifugal Charging Pump B

#### 3.2.2 Licensee's Basis for Requesting Relief

The licensee stated that pump suction pressure is used along with pump discharge pressure to determine pump differential pressure. The installed suction pressure gauge range of the centrifugal charging pumps is 0 to 150 psig. The reference values for suction pressure during IST are between 30 psig and 40 psig. Based on requirements in ISTB-3510(b)(1), this would require as a maximum, a gauge with a range of 0 to 90 psig to bound the lowest reference value for pressure. Applying the accuracy requirement of plus or minus 2 percent for the quarterly pump test, the resulting inaccuracies due to pressure effects would be plus or minus 1.8 psig.

The licensee stated that the installed suction pressure gauge will be calibrated to less than plus or minus 2 percent such that the inaccuracies due to pressure will be less than that required by the ASME OM Code (i.e., 1.8 psig). Use of the installed pressure gauge calibrated to less than plus or minus 2 percent is equivalent in terms of measuring differential pressure. Although the permanently installed suction pressure gauges are above the maximum range limits of the ASME OM Code, they are within the accuracy requirements and are, therefore, suitable for use.

The licensee concluded that using the provisions of this relief request as an alternative to the specific requirements of ISTB-3510(b)(1) will provide adequate indication of pump performance and continue to provide an acceptable level of quality and safety.

#### 3.2.3 Licensee's Proposed Alternative Testing

For the quarterly centrifugal charging pump test, the installed suction pressure gauge calibrated to less than plus or minus 2 percent such that the inaccuracies due to pressure will be less than that required by the ASME OM Code will be used to determine pump suction pressure.

### 3.2.4 Evaluation

The licensee requests relief from the ASME OM Code instrumentation requirements of ISTB-3510(b)(1) for pressure gauges, which are used to measure suction pressure of the centrifugal charging pumps. ISTB-3510(b)(1) requires that the full range of each instrument be no greater than three times the reference value. The licensee proposes to use instrumentation which does not meet the Code requirements.

The installed suction pressure gauge range of the centrifugal charging pumps is 0 to 150 psig. The reference values for suction pressure during IST are between 30 psig and 40 psig. Based on ISTB-3510(b)(1) requirements, this would require as a maximum, a gauge with a range of 0 to 45 psig to bound the lowest reference value for pressure. Applying the accuracy requirement of plus or minus 2 percent for quarterly pump testing, the resulting inaccuracies due to pressure effects would be plus or minus 1.8 psig.

The installed suction pressure gauge will be calibrated to less than plus or minus 2 percent such that the inaccuracies due to pressure will be less than that required by the ASME OM Code (i.e., 1.8 psig). Use of the installed pressure gauge calibrated to less than plus or minus 2 percent is equivalent in terms of measuring suction pressure. Although the permanently installed suction pressure gauges are above the maximum range limits of the ASME OM Code, they are within the accuracy requirements and are, therefore, suitable for use.

The use of the existing suction pressure instrument is supported by NUREG-1482, Paragraph 5.5.1, which states that when the combination of range and accuracy yields a reading at least equivalent to the reading achieved from instruments that meet the ASME OM Code requirements, relief may be granted by the NRC staff. This authorization does not apply to digital instrumentation.

The existing pump suction pressure instruments yield readings at least equivalent to the readings achieved from instruments that meet ASME OM Code requirements, and, thus, provide an acceptable level of quality and safety for quarterly Group A or B pump testing activities, which includes the centrifugal charging pumps.

### 3.2.5 Conclusion

Based on the above evaluation, the NRC staff concludes that the licensee's proposed alternative in RR 3PR-02 is authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the proposed alternative provides an acceptable level of quality and safety for quarterly Group A or B pump testing activities, which includes the centrifugal charging pumps. The licensee's proposed alternative provides reasonable assurance of the operational readiness of the centrifugal charging pumps. This alternative is authorized for the third 10-year IST interval.

### 3.3 Pump Relief Request 3PR-03

#### 3.3.1 Code Requirements

The licensee requested relief from ISTB-3510(b)(1), which requires that the full-scale range of each analog instrument not exceed three times the reference value. Relief was requested for the suction pressure gauge associated with the following pumps:

PAL01A, Motor Driven Auxiliary Feedwater (MD-AFW) Pump A  
PAL01B, Motor Driven Auxiliary Feedwater (MD-AFW) Pump B  
PAL02, Turbine Driven Auxiliary Feedwater (TD-AFW) Pump

#### 3.3.2 Licensee's Basis for Requesting Relief

The licensee stated that pump discharge pressure is used along with pump suction pressure to determine pump differential pressure. The installed suction pressure gauge range of the AFW pumps is 0 to 60 psig. The reference values for discharge pressure during IST is approximately 15 psig. Based on ISTB-3510(b)(1) requirements, this would require as a maximum, a gauge with a range of 0 to 45 psig to bound the lowest reference value for pressure. Applying the accuracy requirement of plus or minus 0.5 percent for the biennial comprehensive pump test, the resulting inaccuracies due to pressure effects would be plus or minus 0.225 psig.

The licensee stated that the installed suction pressure gauge will be calibrated to less than plus or minus 0.5 percent such that the inaccuracies due to pressure will be less than that required by the ASME OM Code (i.e., 0.225 psig). Use of the installed pressure gauge calibrated to less than plus or minus 0.5 percent is equivalent in terms of measuring differential pressure. Although the permanently installed suction pressure gauges are above the maximum range limits of the ASME OM Code, they are within the accuracy requirements and are, therefore, suitable for use.

The licensee concluded that using the provisions of this relief request as an alternative to the specific requirements of ISTB-3510(b)(1) will provide adequate indication of pump performance and continue to provide an acceptable level of quality and safety.

#### 3.3.3 Licensee's Proposed Alternative Testing

For the biennial comprehensive pump test, the installed suction pressure gauge calibrated to less than plus or minus 0.5 percent such that the inaccuracies due to pressure will be less than that required by the ASME OM Code will be used to determine pump suction pressure.

#### 3.3.4 Evaluation

The licensee requests relief from the ASME OM Code instrumentation requirements of ISTB-3510(b)(1) for pressure gauges, which are used to measure suction pressure of the auxiliary feedwater pumps. ISTB-3510(b)(1) requires that the full range of each instrument be no greater than three times the reference value. The licensee proposes to use instrumentation which does not meet the ASME OM Code requirements.

The installed suction pressure gauge range of the auxiliary feedwater pumps is 0 to 60 psig. The reference values for discharge pressure during IST is approximately 15 psig. Based on ISTB-3510(b)(1) requirements, this would require as a maximum, a gauge with a range of 0 to 45 psig to bound the lowest reference value for pressure. Applying the accuracy requirement of plus or minus 0.5 percent for the biennial comprehensive pump test, the resulting inaccuracies due to pressure effects would be plus or minus 0.225 psig.

The installed suction pressure gauge will be calibrated to less than plus or minus 0.5 percent such that the inaccuracies due to pressure will be less than that required by the ASME OM Code (i.e., 0.225 psig). Use of the installed pressure gauge calibrated to less than plus or minus 0.5 percent is equivalent in terms of measuring suction pressure. Although the permanently installed suction pressure gauges are above the maximum range limits of the ASME OM Code, they are within the accuracy requirements and are, therefore, suitable for use.

The use of the existing suction pressure instrument is supported by NUREG-1482, Paragraph 5.5.1, which states that when the combination of range and accuracy yields a reading at least equivalent to the reading achieved from instruments that meet the ASME OM Code requirements, relief may be granted by the NRC staff. This authorization does not apply to digital instrumentation.

The existing pump suction pressure instruments yield readings at least equivalent to the readings achieved from instruments that meet ASME OM Code requirements, and, thus, provide an acceptable level of quality and safety.

### 3.3.5 Conclusion

Based on the above evaluation, the NRC staff concludes that the licensee's alternative in RR 3PR-03 is authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the proposed alternative provides an acceptable level of quality and safety. The licensee's proposed alternative provides reasonable assurance of the operational readiness of the AFW pumps. This alternative is authorized for the third 10-year IST interval.

## 3.4 Valve Relief Request 3VR-01

### 3.4.1 Code Requirements

The licensee requested relief from Appendix I, I-1410(b), which requires that test equipment used to determine valve set pressure shall have an overall combined accuracy not to exceed plus or minus 1 percent of the indicated (measured) set pressure. Relief was requested for the test equipment associated with the following vacuum relief valves:

ENV0058  
ENV0106

### 3.4.2 Licensee's Basis for Requesting Relief

The licensee stated that the vacuum relief valves ENV0058 and ENV0106 must open to provide vacuum protection for the spray additive tank. This function prevents the tank from collapsing in the event of a failure of the discharge isolation valves to close while the tank is empty and the pumps are operating. This condition could cause a vacuum to be created within the tank. The valves are set to relieve vacuum at 0.98 psig vacuum.

The licensee explained that, typically, vacuum breakers are designed to relieve at significantly low differential pressures. Instrument accuracies to meet ASME OM Code requirements would be 0.0098 psig. Pressure instrumentation that provides this level of accuracy for this application is not commercially available and not typically maintained by a power plant facility. As a result, the instrumentation accuracy range will exceed the requirement of Appendix I, I-1410(b).

The functional requirement of a vacuum breaker is only relevant in the opening direction. The closure function is generally irrelevant or passive in that the valve remains closed to maintain the system boundary (e.g., loss of system inventory). For the subject valves, there is not a concern for premature opening since during normal operations the valves are closed with system pressure tending to maintain the valves closed.

The instrument accuracy and target set point for these valves will be established such that the overall combined accuracy specified in the test procedures will limit the actual set pressure to 1 percent above the stamped set pressure. The set point range such that the lower limits for opening of the valves will allow a considerable margin without affecting the valve's performance with respect to the system operating requirements.

#### 3.4.3 Licensee's Proposed Alternative Testing

The instrument accuracy and target set point for these valves will be established such that the overall combined accuracy specified in the test procedures will limit the actual set pressure to 1 percent above the stamped set pressure. The set point range will be established such that the lower limits for opening of the valves will allow a considerable margin without affecting the valve's performance with respect to the system operating requirements.

#### 3.4.4 Evaluation

The licensee requested relief in RR 3VR-01 from the requirements of Appendix I, I-1410(b), which requires that test equipment used to determine valve set-pressure shall have an overall combined accuracy not to exceed plus or minus 1 percent of the indicated set-pressure.

The function of these valves is to open and relieve vacuum to prevent the spray additive tank from collapsing in the event of a failure of the discharge isolation valves to close while the tank is empty and the pumps are operating and this function will be met even if the valves lift slightly earlier than the ASME OM Code requirement. The proposed alternative will limit the actual set pressure to 1 percent above the stamped set pressure and establish the set point range such that the lower limits for opening of the valves will establish a considerable margin with respect to the system operating requirements. Requiring the licensee to purchase or contract for instrumentation that meets the ASME OM Code requirement would create a hardship or

unusual difficulty without a compensating increase in the level of quality and safety. The licensee proposed alternative in RR 3VR-01 provides reasonable assurance of the operational readiness of the identified vacuum relief valves.

#### 3.4.5 Conclusion

Based on the above evaluation, the NRC staff concludes that the licensee's alternative in RR 3VR-01 is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the ASME OM Code requirements results in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The licensee's proposed alternative provides reasonable assurance of the operational readiness of the identified vacuum relief valves. This alternative is authorized for the third 10-year IST interval.

#### 4.0 CONCLUSION

Based on the above evaluation, the NRC staff concludes that the licensee's proposed alternatives in RRs 3PR-01, 3PR-02, and 3PR-03 are authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the proposed alternatives provide an acceptable level of quality and safety. The licensee's proposed alternative provides reasonable assurance of the operational readiness of the RHR, centrifugal charging, and AFW pumps. These alternatives are authorized for the third 10-year IST interval.

In addition, based on the above evaluation, the NRC staff concludes that the licensee's alternative in RR 3VR-01 is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the ASME OM Code requirements results in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The licensee's proposed alternative provides reasonable assurance of the operational readiness of the identified vacuum relief valves. This alternative is also authorized for the third 10-year IST interval.

Principal Contributor: Keith Poertner

Date: March 21, 2006

Wolf Creek Generating Station

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