

April 18, 2006

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

FROM: Jack N. Donohew, Senior Project Manager */RA/*
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: WOLF CREEK GENERATING STATION RE: REVISION TO
TECHNICAL SPECIFICATION TABLE 3.3-1 TO ADD
SURVEILLANCE REQUIREMENT 3.3.1.16 (TAC NO. MD0027)

In its application dated February 7, 2006 (ET 06-0002), Wolf Creek Nuclear Operating Corporation (WCNOC/the licensee) submitted a license amendment request (LAR) to add Surveillance Requirement 3.3.1.16 to Function 3.a, Power Range Neutron Flux Rate - High Positive Rate, in Technical Specification Table 3.3.1-1, "Reactor Trip System Instrumentation," for the Wolf Creek Generating Station (WCGS). In the LAR, there is the following statement, on page 2 of 6 of Attachment I to the application: "The assumptions and methods used for this analysis are consistent with earlier analyses performed for this [bank withdrawal at power (RWAP)] event as described in USAR [WCGS Updated Safety Analysis Report] Section 15.4.2 to a great extent." USAR Section 15.4.2 is the accident analysis of the uncontrolled rod cluster control assembly (RCCA) bank withdrawal at power and the LAR involves this design-basis accident.

In the telephone conference call held on March 21, 2006, I requested the licensee to explain what it meant by the above statement. The licensee said that the changes in "assumptions and methods" were primarily using the new method of analyzing the RCCA bank withdrawal accident using RETRAN-3D in the RETRAN-02 mode, but that there were also changes to assumptions and methods which were considered more conservative than the earlier analyses. Based on this conference call, I sent an e-mail to the licensee asking if it was correct to state that all these changes to assumptions and methods were evaluated under Section 50.59 of Title 10 of the *Code of Federal Regulations* (10 CFR) and determined to be changes that were not required by 10 CFR 50.59 to be reviewed and approved by the Nuclear Regulatory Commission (NRC) prior to implementing the changes, and the primary change is using RETRAN-3D in the RETRAN-02 mode?

Attached is the e-mail response to my question. In the attached e-mail, the licensee stated the following:

The uncontrolled RCCA Withdrawal at Power reanalysis was performed in accordance with the calculation process. With the completion of the reanalysis the [10 CFR] 50.59 process was applied which identified several changes to the analysis and determined that a change to the Technical

Specifications was required since the reanalysis results in crediting the positive flux rate trip. A 50.59 evaluation was drafted for the changes to the analyses and determined that the changes to the analysis were conservative with the exception of crediting the positive flux rate trip which required a change to the Technical Specifications and NRC approval of that change. Use of the RETRAN-3D is considered a change in methodology, however, since the use of RETRAN-3D in RETRAN-02 modes have been reviewed and approved by the NRC and found acceptable for use by licensees, Wolf Creek specific approval of the use of RETRAN-3D in RETRAN-02 modes is not required.

The [10 CFR] 50.59 process requires determination if NRC approval is required and the change can not be implemented until NRC approval is obtained. The uncontrolled RCCA Withdrawal at Power reanalysis can not become the "analyses of record" until implementation of the license amendment and review/approval of the 50.59 evaluation. This implies that the 50.59 evaluation would be reviewed and approved by WCNO, as appropriate, as part of the implementation of the license amendment.

The licensee's response to my question on the LAR provides additional clarifying information, does not expand the scope of the application as originally noticed, and does not change the staff's original proposed no significant hazards consideration determination for the LAR that was published in the *Federal Register* on February 28, 2006 (71 FR 10080).

Docket No. 50-482

Attachment: E-mail Dated April 4, 2006

positive flux rate trip. A 50.59 evaluation was drafted for the changes to the analyses and determined that the changes to the analysis were conservative with the exception of crediting the positive flux rate trip which required a change to the Technical Specifications and NRC approval of that change. Use of the RETRAN-3D is considered a change in methodology, however, since the use of RETRAN-3D in RETRAN-02 modes have been reviewed and approved by the NRC and found acceptable for use by licensees, Wolf Creek specific approval of the use of RETRAN-3D in RETRAN-02 modes is not required.

The [10 CFR] 50.59 process requires determination if NRC approval is required and the change can not be implemented until NRC approval is obtained. The uncontrolled RCCA Withdrawal at Power reanalysis can not become the "analyses of record" until implementation of the license amendment and review/approval of the 50.59 evaluation. This implies that the 50.59 evaluation would be reviewed and approved by WCNO, as appropriate, as part of the implementation of the license amendment.

The licensee's response to my question on the LAR provides additional clarifying information, does not expand the scope of the application as originally noticed, and does not change the staff's original proposed no significant hazards consideration determination for the LAR that was published in the *Federal Register* on February 28, 2006 (71 FR 10080).

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Attachment: E-mail Dated April 4, 2006

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DATE	4/18/06	4/12/06	4/18/06

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E-MAIL DATED APRIL 4, 2006

From: "Hooper Diane M" <dihoope@WCNOC.com>
To: "Jack Donohew" <JND@nrc.gov>
Date: 4/4/06 5:31PM
Subject: RE: License Amendment to Add SR 3.3.1.16 to TS Table 3.3.1-1
[TAC NO. MD0027

Jack [Donohew],

In response to the e-mail below, it was requested that we clarify that the review and approval of the 50.59 evaluation is considered as part of the implementation of the license amendment. The second paragraph has been modified by adding an additional sentence. If you have any questions, please contact me or Steve Wideman.

The following is being submitted:

The uncontrolled RCCA Withdrawal at Power reanalysis was performed in accordance with the calculation process. With the completion of the reanalysis the 50.59 process was applied which identified several changes to the analysis and determined that a change to the Technical Specifications was required since the reanalysis results in crediting the positive flux rate trip. A 50.59 evaluation was drafted for the changes to the analyses and determined that the changes to the analysis were conservative with the exception of crediting the positive flux rate trip which required a change to the Technical Specifications and NRC approval of that change. Use of the RETRAN-3D is considered a change in methodology, however, since the use of RETRAN-3D in RETRAN-02 modes have been reviewed and approved by the NRC and found acceptable for use by licensees, Wolf Creek specific approval of the use of RETRAN-3D in RETRAN-02 modes is not required.

The 50.59 process requires determination if NRC approval is required and the change can not be implemented until NRC approval is obtained. The uncontrolled RCCA Withdrawal at Power reanalysis can not become the "analyses of record" until implementation of the license amendment and review/approval of the 50.59 evaluation. This implies that the 50.59 evaluation would be reviewed and approved by WCNOC, as appropriate, as part of the implementation of the license amendment.

-----Original Message-----

From: Jack Donohew [mailto:JND@nrc.gov]
Sent: Wednesday, March 22, 2006 6:28 AM
To: Wideman Steven G
Cc: Hooper Diane M
Subject: License Amendment to Add SR 3.3.1.16 to TS Table 3.3.1-1

The license amendment application is dated February 7, 2006 (ET 06-0002). Yesterday, in discussing the statement on page 2 of 6 of Attachment I that "The assumptions and methods used for this analysis are consistent with earlier analyzes performed for this event [RWAP] as described in USAR Section 15.4.2 to a great extent," I was told that the changes in "assumptions and methods" were primarily using the new method of analyzing the accident

using RETRAN-3D in the RETRAN-02 mode, but that there were also changes to assumptions and methods which were considered more conservative than the earlier analyzes.

Is it correct to stated that all these changes to assumptions and methods were evaluated under 10 CFR 50.59 and determined to be changes that were not required by 10 CFR 50.59 to be reviewed and approved by NRC prior to implementing the changes, and the primary change is using RETRAN-3D in the RETRAN-02 mode?

<JND>

CC: "Lafin Frank M" <frlafli@WCNOC.com>, "Wideman Steven G" <stwidem@WCNOC.com>

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