

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Stephen E. Hedges
Vice President Operations and Plant Manager

May 24, 2006

WO 06-0022

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

Reference: Letter ET 06-0001, dated February 1, 2006, from T. J. Garrett, WCNO, to the NRC.

Subject: Docket No. 50-482: Supplement to Revision to Technical Specification 5.5.8, "Inservice Testing Program" to Adopt Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-479, Revision 0

Gentlemen:

The Reference provided Wolf Creek Nuclear Operating Corporation's (WCNO) application to revise Technical Specification (TS) 5.5.8, "Inservice Testing Program," for consistency with the requirements of 10 CFR 50.55a(f)(4) for pumps and valves which are classified as American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3.

The proposed changes to TS 5.5.8 were based on Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-479, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a." Revision 3.1 of NUREG-1431, "Standard Technical Specifications Westinghouse Plants," incorporated TSTF-479, Revision 0, based on a Nuclear Regulatory Commission (NRC) letter dated December 6, 2005, indicating the acceptability of TSTF-479, Revision 0. However, the NRC has indicated that what was originally approved by the NRC is not acceptable and is requesting additional changes to TS 5.5.8b.

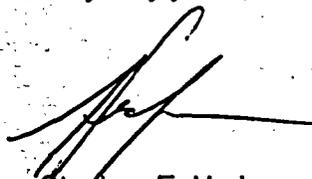
Attachment I provides a discussion regarding the additional changes to TS 5.5.8b. Attachment II provides a new markup of the changes to TS 5.5.8 and supersedes the TS markup provided in Attachment II of the Reference.

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The additional changes to the Technical Specifications have been reviewed by the Plant Safety Review Committee. The additional information provided in the Attachments does not impact the conclusions of the No Significant Hazard Consideration provided in the Reference. In accordance with 10 CFR 50.91, a copy of this submittal is being provided to the designated Kansas State official. WCNOG requests that the NRC review the fees assessed this licensing action and remove those associated with the resolution of TS 5.5.8b. and TSTF-479. WCNOG does not believe resolution of these issues should be assessed individual licensees when the licensee pursues a generic change that was approved by the NRC.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4190, or Mr. Kevin Moles at (620) 364-4126.

Very truly yours,



Stephen E. Hedges

SEH/rlt

Attachments

cc: T. A. Conley (NRC), w/a
J. N. Donohew (NRC), w/a
W. B. Jones (NRC), w/a
B. S. Mallett (NRC), w/a
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

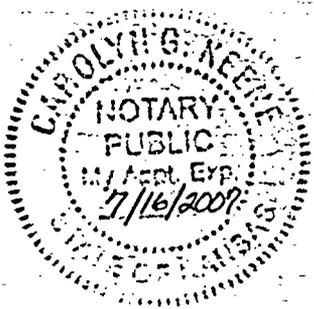
Stephen E. Hedges, of lawful age, being first duly sworn upon oath says that he is Vice President Operations and Plant Manager of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the contents thereof; that he has executed the same for and on behalf of said Corporation 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 
Stephen E. Hedges
Vice President Operations and Plant Manager

SUBSCRIBED and sworn to before me this 24th day of May, 2006.


Notary Public

Expiration Date July 16, 2007



SUPPLEMENTAL INFORMATION

Proposed Change

Reference 1 provided Wolf Creek Nuclear Operating Corporation's (WCNOC) application to revise Technical Specification (TS) 5.5.8, "Inservice Testing Program," for consistency with the requirements of 10 CFR 50.55a(f)(4) for pumps and valves which are classified as American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3. The proposed changes to TS 5.5.8 were based on Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-479, Revision 0 (Reference 2), "Changes to Reflect Revision of 10 CFR 50.55a." Revision 3.1 of NUREG-1431, "Standard Technical Specifications Westinghouse Plants," incorporated TSTF-479, Revision 0, based on an Nuclear Regulatory Commission (NRC) letter dated December 6, 2005 (Reference 3), indicating the acceptability of TSTF-479, Revision 0.

Reference 1 proposed to revise TS 5.5.8b. to indicate that there may be some non-standard Frequencies utilized in the Inservice Test Program (IST) in which the provisions of Surveillance Requirement (SR) 3.0.2 are applicable. Specifically, it was proposed that TS 5.5.8b. be revised to state:

"The provisions of SR 3.0.2 are applicable to the above required Frequencies and other normal and accelerated Frequencies specified in the Inservice Testing Program for performing inservice testing activities.

The NRC has indicated that what was approved by the NRC in TSTF-479 is not acceptable and is requesting additional changes to TS 5.5.8b. On April 2, 2006, the Technical Specification Task Force provided by electronic mail to the NRC Technical Specification Branch, wording for TS 5.5.8b. which addresses the staff concern and could be used for plant-specific amendments to adopt TSTF-479 until such time as the Technical Specification Task Force provides and the NRC accepts the TSTF-479 wording. Provided below is the proposed wording for TS 5.5.8b. from the April 2, 2006 electronic mail:

"The provisions of SR 3.0.2 are applicable to the above required Frequencies and other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities.

On April 12, 2006, WCNOC provided to the NRC Project Manager by electronic mail, proposed changes to TS 5.5.8b. based on further review of NUREG-1482, Rev. 1 (Reference 4), Section 3.1.3. WCNOC proposed the following wording:

"The provisions of SR 3.0.2 are applicable to the above required Frequencies and other normal and accelerated Frequencies specified in the Inservice Testing Program for performing inservice testing activities. The Frequency of testing activities for safety and relief valves as defined in Appendix 1 of the ASME OM Code should not be extended other than to coincide with a refueling outage;"

Subsequently, the NRC Project Manager informed WCNOC that in discussions with the appropriate NRC technical branch, the interpretation of the wording in NUREG-1482, Rev. 1, is that the 25% allowance of SR 3.0.2 is only applicable to Frequencies of up to 2 years. While

WCNOC does not agree with this interpretation, we are proposing to utilize the below wording and may propose additional changes based on subsequent TSTF travelers that result in changes to this wording.

"The provisions of SR 3.0.2 are applicable to the above required Frequencies and other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities.

Attachment II provides a new markup of the changes to TS 5.5.8 and supersedes the TS markup provided in Attachment II of Reference 1.

References:

1. WCNOC letter ET 06-0001, dated February 1, 2006, from T. J. Garrett, WCNOC, to the NRC.
2. Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-479, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a."
3. NRC letter dated December 6, 2005, from T. H. Boyce, NRC, to Technical Specifications Task Force.
4. NUREG-1482, Revision 1, "Guidelines for Inservice Testing at Nuclear Power Plants."

ATTACHMENT II
MARKUP OF TECHNICAL SPECIFICATION PAGE

5.5 Programs and Manuals

5.5.7 Reactor Coolant Pump Flywheel Inspection Program (continued)

radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels may be conducted at 20 year intervals.

5.5.8 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

OM

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities

applicable to the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code)

Weekly
Monthly
Quarterly or every 3 months
Semiannually or every 6 months
Every 9 months
Yearly or annually
Biennially or every 2 years

Required Frequencies for performing inservice testing activities

At least once per 7 days
At least once per 31 days
At least once per 92 days
At least once per 184 days
At least once per 276 days
At least once per 366 days
At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

OM

and other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program

(continued)