

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Stephen E. Hedges
Vice President Operations and Plant Manager

October 25, 2006
WO 06-0041

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

Reference: Letter WM 06-0033, dated August 25, 2006, from M. W. Sunseri, WCNOC, to USNRC

Subject: Docket No. 50-482: Response to Request for Additional Information Related to License Amendment Request to Revise Technical Specification (TS) 3.7.2, "Main Steam Isolation Valves (MSIVs)," and TS 3.7.3, "Main Feedwater Isolation Valves (MFIVs)"

Gentlemen:

The Reference provided Wolf Creek Nuclear Operating Corporation's (WCNOC) application to revise Technical Specification (TS) 3.7.2, "Main Steam Isolation Valves (MSIVs)," and TS 3.7.3, "Main Feedwater Isolation Valves (MFIVs)," to incorporate the MSIV actuator trains and MFIV actuator trains into the Limiting Condition for Operation (LCO) and provide associated Conditions and Required Actions. On October 12, 2006, the Nuclear Regulatory Commission (NRC) provided a request for additional information (RAI) via electronic mail. A draft response to the RAI was provided via electronic mail on October 18, 2006.

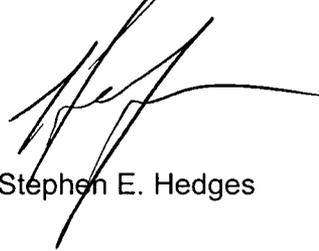
Attachment I provides a response to the question provided by electronic mail. Attachment II provides a revised TS 3.7.3 page as discussed in the response to the RAI.

The additional information provided in the Attachments does not impact the conclusions of the No Significant Hazards 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.

A001

This submittal 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,

A handwritten signature in black ink, appearing to read 'SEH', with a long horizontal flourish extending to the right.

Stephen E. Hedges

SEH/rlt

Attachments

cc: T. A. Conley (KDHE), w/a
J. N. Donohew (NRC), w/a
G. E. Werner (NRC), w/a
B. S. Mallett (NRC), w/a
Senior Resident Inspector (NRC), w/a

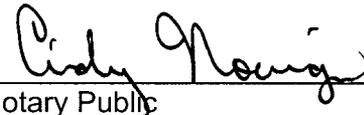
STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

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 25th day of Oct., 2006.



 _____
Notary Public

Expiration Date 7/8/10

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

This Attachment provides Wolf Creek Nuclear Operating Corporation's (WCNOC) response to the Nuclear Regulatory Commission (NRC) request for additional information (RAI) received via electronic mail on October 12, 2006.

1. In the application dated 08/25/06, it has been proposed to retain "Separate Condition Entry" (SCE) for tracking Completion Times in the MFIV TS 3.7.3 (the Note for TS 3.7.3) and but this has not been proposed in the MSIV TS 3.7.2. Using the SCE notation to the limiting condition for operation (LCO) ACTIONS modifies how the Completion Time is tracked.

The TS 3.4.3 [3.7.3] Note allows each of the LCO 3.7.3 Conditions to be entered separately for each inoperable valve and actuator train, and Completion Times tracked on a per component (valve or actuator train) basis. Therefore, Wolf Creek Nuclear Operating Corporation (WCNOC) proposed LCO Conditions that address inoperable actuator trains for different MFIVs and inoperable actuator trains for different actuator train separation groups. It is requested that WCNOC prepare guidance to show how the Completion Time Example 1.3-5 convention would apply to the combinations of inoperable components in each of the new Conditions being added to LCO 3.7.3.

Response: A "separate Condition entry" Note was not proposed for Technical Specification (TS) 3.7.2, "Main Steam Isolation Valves (MSIVs)," since current Condition B (proposed Condition H) contains a "separate Condition entry" Note for one or more MSIVs inoperable in MODE 2 or 3. WCNOC is maintaining the "separate Condition entry" Note in TS 3.7.2 consistent with what the NRC approved for the Callaway Plant in License Amendment No. 172 dated June 16, 2006. For TS 3.7.3, "Main Feedwater Isolation Valves (MFIVs)," the "separate Condition entry" Note to the ACTIONS Table is applicable only to the MFIVs and not the actuator trains (i.e., only applies to new Condition F). WCNOC believes that the "separate Condition entry" should be maintained based on the very short Completion Time for new Condition F and maintaining the Note is consistent with NUREG-1431, Rev. 3.1, "Standard Technical Specifications Westinghouse Plants." To eliminate any confusion, WCNOC is proposing to move the Note to Condition F. Attachment II provides a revised TS 3.7.3 markup. Page 2 of 2 of Attachment II replaces Page 6 of 8 in Attachment II to WM 06-0033.

ATTACHMENT II
MARKUP OF TECHNICAL SPECIFICATION PAGES

3.7 PLANT SYSTEMS

3.7.3 Main Feedwater Isolation Valves (MFIVs)

LCO 3.7.3 Four MFIVs shall be OPERABLE.

and their associated actuator trains

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

NOTE
Separate Condition entry is allowed for each ~~valve~~ MFIV.

INSERT 3.7-7	CONDITION	REQUIRED ACTION	COMPLETION TIME
	One or more MFIVs inoperable.		4 hours Once per 7 days
	Required Action and associated Completion Time not met.		6 hours 12 hours