

# **WOLF CREEK** NUCLEAR OPERATING CORPORATION

January 31, 2007

Kevin J. Moles  
Manager Regulatory Affairs

RA 07-0011

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

- References:
- 1) Letter ET 95-0112, dated October 31, 1995, from R. C. Hagan, WCNOC, to USNRC
  - 2) Letter WO 95-0189, dated December 27, 1995, from O. L. Maynard, WCNOC, to USNRC
  - 3) NRC Letter dated February 9, 1996, from USNRC to N. S. Carns, WCNOC

Subject: Docket No. 50-482: Containment Inservice Inspection Program First Interval, Third Period, Refueling Outage 15 Owner's Activity Report

Gentlemen:

This submittal provides the Owner's Activity Report for Refueling Outage 15 (RF15), which is the first outage of the third period of the first interval of the Wolf Creek Nuclear Operating Corporation (WCNOC) Containment Inservice Inspection Program. American Society of Mechanical Engineers (ASME) Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000," requires that an Owner's Activity Report (Form OAR-1) be prepared and certified upon completion of each refueling outage. Each Form OAR-1 prepared during an inspection period shall be submitted following the end of the inspection period. The RF15 Form OAR-1 is also submitted in accordance with Wolf Creek Generating Station (WCGS) Technical Requirements Manual 3.6.1, which requires the submittal of the Form OAR-1 within 90 days of the completion of the refueling outage for the operational cycle in which tendon surveillance testing was performed.

In References 1 and 2, WCNOC requested use of ASME Code Case N-532 in lieu of current ASME Section XI reporting requirements. In Reference 3, the Nuclear Regulatory Commission (NRC) concluded that the proposed alternative to use Code Case N-532 and the clarifications contained within References 1 and 2 provide

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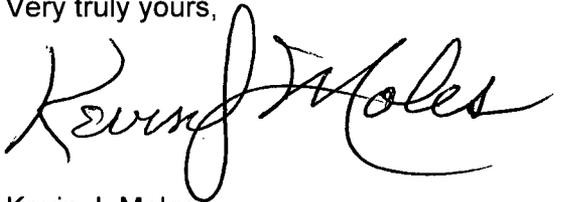
an acceptable level of quality and safety and approved the use of Code Case N-532 for use at WCGS.

The enclosure provides the Owner's Activity Report (Form OAR-1) for the period of May 20, 2005 through November 10, 2006 (RF14 ended May 19, 2005 and RF15 ended November 10, 2006). This timeframe constitutes operational cycle 15, which is the first operational cycle of the third period of the first interval of the WCNOG Containment Inservice Inspection Program. The enclosed Form OAR-1 (Report WCRE-11, I1-P3-RF15) corresponds to this cycle.

There are no commitments contained within this letter.

If you have any questions concerning this matter, please contact me at (620) 364-4126 or Ms. Diane Hooper at (620) 364-4041.

Very truly yours,

A handwritten signature in black ink that reads "Kevin J. Moles". The signature is written in a cursive style with a large, prominent "K" and "M".

Kevin J. Moles

KJM/rit

Enclosure

cc: J. N. Donohew (NRC), w/e  
V. G. Gaddy (NRC) w/e  
B. S. Mallett (NRC), w/e  
Senior Resident Inspector (NRC), w/e

FORM OAR-1 OWNER'S ACTIVITY REPORT

Report Number WCRE-11, 11-P3-RF-15

Owner Wolf Creek Nuclear Operating Corporation, 1550 Oxen Lane Northeast, Burlington, Kansas 66839  
(Name and Address of Owner)

Plant Wolf Creek Generating Station, 1550 Oxen Lane Northeast, Burlington, Kansas 66839  
(Name and Address of Plant)

Unit No. 1 Commercial service date 9-3-85 Refueling outage no. 15  
(If applicable)

Current inspection interval 1<sup>st</sup> Interval for the Containment Inservice Inspection Program  
(1st. 2nd. 3rd. 4th. other)

Current inspection period 3<sup>rd</sup> period for the Containment Inservice Inspection Program  
(1st. 2nd. 3rd)

Edition and Addenda of Section XI applicable to the inspection plan 1998 edition with no addenda

Date and revision of inspection plan WCRE-11 Rev. 3, dated 9-21-2006

Edition and Addenda of Section XI applicable to repairs and replacements, if different than the inspection plan 1992 edition with 1992 addenda

CERTIFICATE OF CONFORMANCE

I certify that the statements made in this Owner's Activity Report are correct, and that the examinations, tests, repairs, replacements, evaluations, and corrective measures represented by this report conform to the requirements of Section XI.

Certificate of Authorization No. N/A Expiration Date N/A  
(If applicable)

Signed Dennis E. Tougaw *Dennis E. Tougaw* Engineer Date January 25, 2007  
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State of Kansas and employed by The Hartford Steam Boiler Inspection and Insurance Company of Connecticut of Hartford, Connecticut have inspected the items described in this Owner's Activity Report, during the period May 20, 2005 to November 10, 2006, and state that to the best of my knowledge and belief, the Owner has performed all activities represented by this report in accordance with the requirements of Section XI.

By signing this certificate neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the examinations, tests, repairs, replacements, evaluations and corrective measures described in this report. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

*Q. B. Field* Commissions KS#594 A, N, I  
Inspector's Signature National Board, State, Province, and Endorsements

Date 1/25/07

This form (E00127) may be obtained from the Order Dept., ASME, 22 Law Drive, Box 2300, Fairfield, NJ 07007-2300

**TABLE 1**  
**ABSTRACT OF EXAMINATIONS AND TESTS**  
**Completion of RF-15 (I-1, P-3)**

Examination Category	Total Examinations Required For The Interval	Total Examinations Credited for This Period*	Total Examinations Credited (%) for The Period	Total Examinations Credited (%) to Date for the Interval	Remarks
E-A	823	5	1	67	Note 1
E-C	8	1	12	50	Note 2
L-A	12	6	50	100	Note 3
L-B	26	26	100	100	Notes 3, 4

\* This column is interpreted to represent the cumulative number of exams performed to date in this period.

Note 1: 100% of the Accessible Surface Areas of Category E-A are required to be inspected each Inspection Period per Table IWE-2500-1

Note 2: In accordance with IWE-1241, 4 components were reclassified as Category E-C in Period 2 resulting in 8 examinations in this Category being required for the Interval.

Note 3: The IWL components (Categories L-A and L-B) are examined on a 5 year period basis at this point in the WCGS plant life. The IWL periods in the current Containment Inservice Program Plan correspond to the 15<sup>th</sup> and 20<sup>th</sup> year anniversary.

Note 4: As permitted by 10 CFR 50.55a, the initial examination of the tendons was conducted in accordance with the existing Tech Spec program. Thus only the tendon examinations after revision of the Tech Specs to utilize IWL (the 20<sup>th</sup> year anniversary) are listed.

**TABLE 2**  
**ITEMS WITH FLAWS OR RELEVANT CONDITIONS THAT**  
**REQUIRED EVALUATION FOR CONTINUED SERVICE**

Examination Category	Item Number	Item Description	Flaw Characterization (IWA-3300)	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes or No)
L-A	L1.12	Tendon Anchorage Areas of Tendon Access Gallery; Vertical Grease Caps	Small amount of grease leakage noted.	Yes
L-B	L2.40	Tendon 22CB; Corrosion Protection Medium	The absolute difference between the amount removed and the amount replaced exceeded 10 percent of the tendon net duct volume.	Yes
L-B	L2.40	Tendon 1AC; Corrosion Protection Medium	The absolute difference between the amount removed and the amount replaced exceeded 10 percent of the tendon net duct volume.	Yes
L-B	L2.40	Tendon 46BA Corrosion Protection Medium	The absolute difference between the amount removed and the amount replaced exceeded 10 percent of the tendon net duct volume.	No
L-B	L2.40	Tendon V65 Corrosion Protection Medium	The absolute difference between the amount removed and the amount replaced exceeded 10 percent of the tendon net duct volume.	Yes

Attachment 1 provides further information as required by the Containment Inservice Inspection Program.

**TABLE 3**  
**ABSTRACT OF REPAIRS, REPLACEMENTS, OR CORRECTIVE MEASURES**  
**REQUIRED FOR CONTINUED SERVICE**

Code Class	Repair, Replacement, or Corrective Measure	Item Description	Description of Work	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes/No)	Date Complete	Repair/Replacement Plan Number
<p>There were no repairs, replacements, or corrective measures performed on any Class MC or CC items during the period of this report, which were required due to an item containing a flaw or relevant condition that exceeded acceptance criteria.</p>						

**Attachment 1**  
**RF-15 IWL Examination**

1. The condition noted in Table 2 of the absolute difference between the amount removed and the amount replaced exceeding 10 percent of the tendon net duct volume for Tendons 22CB, 1AC, 46BA and V65 was evaluated in CCP 11852. The amounts replaced ranged from 10.7% to 17.35% of the net duct volume. This evaluation noted that the leak-tightness and structural integrity of containment is maintained.
2. All de-tensioned tendons were re-tensioned with acceptable elongations. The re-tensioning force of tendons were within the limit of 10% from that recorded during the last measurement.
3. The sheathing filler (grease) samples were tested and found to contain less than 10 percent by weight of chemically combined water (Chlorides, Nitrates, and Sulfides) or the presence of free water.
4. All tendons were resealed and re-greased.
5. During general visual examination of the containment surface, no grease leakage was on the containment surface. However, as noted in Table 2, grease leakage was noted on the tendon anchorage areas of the grease caps in the Tendon Access Gallery. This was evaluated in SWO 05-275375-001. The evaluation finds that this small leakage is not a non-conformance.
6. Tendon 46BA is not part of original 20<sup>th</sup> year tendon inspection scope. The tendon was regreased due to the grease can being changed out at this location.