

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Terry J. Garrett
Vice President, Engineering

July 11, 2007

ET 07-0028

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

- Reference:
- 1) Letter ET 06-0038, dated September 27, 2006, from T.J. Garrett, WCNOG, to USNRC
 - 2) Letter ET 07-0011, dated May 2, 2007, from T.J. Garrett, WCNOG, to USNRC
 - 3) Telephone Conference Summary dated June 15, 2007, from V. Rodriguez, USNRC (ML071640024)
 - 4) Telephone Conference Summary dated June 25, 2007, from V. Rodriguez, USNRC (ML071690318)

Subject: Docket No. 50-482: Followup Response to NRC Requests for Additional Information Related to Wolf Creek Generating Station License Renewal Application


Gentlemen:

Reference 1 provided Wolf Creek Nuclear Operating Corporation's (WCNOG) License Renewal Application for the Wolf Creek Generating Station (WCGS). Reference 2 provided WCNOG responses to NRC requests for additional information (RAI) regarding the License Renewal Application. References 3 and 4 documented telephone conference calls held on June 8, 2007 and June 14, 2007 to discuss and clarify the WCNOG responses. Attachment I provides followup responses to the RAIs discussed on the conference calls.

Attachment II provides a summary of the commitments made in this response.

If you have any questions concerning this matter, please contact me at (620) 364-4084, or Mr. Kevin Moles at (620) 364-4126.

Sincerely,



Terry J. Garrett

TJG/rlt


A121

Attachments I WCNOC Followup Response to NRC Requests for Additional Information
II List of Commitments

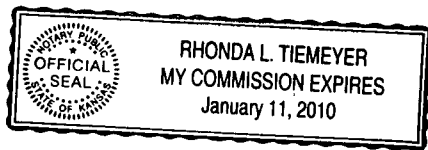
cc: J. N. Donohew (NRC), w/a
V. G. Gaddy (NRC), w/a
B. S. Mallett (NRC), w/a
V. Rodriguez (NRC), w/a
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Terry J. Garrett, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering 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 
Terry J. Garrett
Vice President Engineering

SUBSCRIBED and sworn to before me this 11th day of July, 2007.



Rhonda L. Tiemeyer
Notary Public

Expiration Date January 11, 2010

Attachment I

**Wolf Creek Nuclear Operating Corporation's (WCNOC) Followup Response
to NRC Requests for Additional Information (RAI) Related to Wolf Creek
Generating Station (WCGS) License Renewal Application (LRA)**

RAI 2.3.3.16-1
RAI 2.3.4.2-1
RAI 2.3.4.2-2
RAI 2.3.4.2-5
RAI 2.3.3.14-5

Emergency Diesel Engine System

RAI 2.3.3.16-1 Followup Discussion

During a telephone conference call on June 8, 2007, the staff requested that the applicant justify why tank vents are not included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2) as they functionally support the operation of the tank.

RAI 2.3.3.16-1 Followup Response

As a follow-up to RAI 2.3.3.16-1, the vent line for the Emergency Diesel Engine Jacket Water Expansion Tanks will be included within the scope of license renewal.

The tank vents are vendor supplied components and do not have unique plant tag numbers. The tank vents will be added as a generic piping component.

LRA Table 2.3.3-16 will be amended to include "Leakage Boundary Spatial" (LBS) to the Intended Functions for the Component Type "Piping".

LRA Table 3.3.2-16 will be amended to add the following two new lines:

Component Type:	Piping
Intended Function:	LBS
Material:	Carbon Steel
Environment:	Wetted Gas (internal)
Aging Effect:	Loss of Material
AMP:	Inspection of Internal Surfaces in Miscellaneous Piping & Ducting (B2.1.22)
NUREG-1801 Vol 2 Item:	VII.H2-21
Table 1 Item:	3.3.1.71
Note:	A

Component Type:	Piping
Intended Function:	LBS
Material:	Carbon Steel
Environment:	Plant Indoor Air (external)
Aging Effect:	Loss of Material
AMP:	External Surfaces Monitoring Program (B2.1.20)
NUREG-1801 Vol 2 Item:	VII.I-8
Table 1 Item:	3.3.1.58
Note:	A

Main Steam System

RAI 2.3.4.2-1 Followup Discussion

During a telephone conference call on June 8, 2007, the staff indicated that the response to this RAI requires clarification. The staff requested that the applicant address the potential effects of a degraded exhaust silencer on the intended function of the atmospheric relief valves. The staff also requested that the applicant identify that no age related degradation of the atmospheric relief valve silencers could affect their intended function.

RAI 2.3.4.2-1 Followup Response

The atmospheric relief valves exhaust silencers will be included in the scope of license renewal. The affected LRA sections will be amended:

(a) LRA Table 2.3.4-2 will be updated to include the component type "Silencer" with intended function of "direct flow", (b) LRA Section 3.4.2.1.2 will be updated to add an environment of Atmosphere/Weather. (c) LRA Table 3.4.2-2 will be updated to add a carbon steel silencer in an atmosphere/weather environment (external) and wetted gas environment (internal). Consistent with NUREG-1801, line VIII.H-8, Loss of Material on the external surfaces of the silencer will be managed with the "External Surface Monitoring" AMP (B2.1.20). Also, consistent with NUREG-1801, line VIII.B1-7, Loss of Material on the internal surfaces of the silencer will be managed with the "Inspection Of Internal Surfaces In Miscellaneous Piping And Ducting Components" AMP (B2.1.22).

RAI 2.3.4.2-2 Followup Discussion

During a telephone conference call on June 8, 2007, the staff indicated that the response to this RAI requires clarification. The staff requested that the applicant address the function of the steam trap as a valve body with a pressure boundary function and that the steam trap's configuration be described. The staff requested that the applicant clarify if there is an analysis or calculation that justify the exclusion of the steam traps from the scope of license renewal.

RAI 2.3.4.2-2 Followup Response

The current WCGS license basis for Post-Fire Safe Shutdown (PFSSD) includes calculation XX-E-013 "Post-Fire Safe Shutdown Analysis." Calculation XX-E-013, which lists the components required for PFSSD, does not include any components in the turbine building on lines of 1" or less. The steam traps discussed in RAI 2.3.4.2-2 (ST0001, ST0002, ST0003, and ST0004) are located on lines of 1" or less. Therefore, these steam traps are not components required for PFSSD and are not within the scope of license renewal.

RAI 2.3.4.2-5 Followup Discussion

During a telephone conference call on June 8, 2007, the staff indicated that the response to this RAI requires clarification. The staff requested that the applicant clarify if there is an analysis or calculation that justify the exclusion of the 1" diameter piping from the scope of license renewal.

RAI 2.3.4.2-5 Followup Response

The current WCGS license basis for Post-Fire Safe Shutdown (PFSSD) includes calculation XX-E-013 "Post-Fire Safe Shutdown Analysis." Appendix 3 to XX-E-013 lists all of the components in scope for PFSSD. Components in the turbine building installed on 1" or under lines are excluded from the components listed in Appendix 3 to XX-E-013 for PFSSD. Therefore, the 1" lines discussed in RAI 2.3.4.2-5 are not components required for PFSSD and are not within the scope of license renewal.

Fire Protection System

RAI 2.3.3.14-5 Followup Discussion

During a telephone conference call on June 14, 2007, the staff indicated that the response to this RAI requires clarification. The applicant's response lists fire water suppression systems that are not within the scope of license renewal. The staff finds this inconsistent with the WCGS USAR Section 9.5. The staff requested that the applicant justify why these components were not included within the scope of license renewal pursuant to 10 CFR 54.4(a)(3) as some of them are required for compliance with 10 CFR 50.48, and 10 CFR Part 50, Appendix A, Criterion 3 (GDC 3).

RAI 2.3.3.14-5 Followup Response

The fire water suppression systems that are within the scope of license renewal as identified in RAI 2.3.3.14-5 are the systems required for compliance with 10CFR50.48 and 10CFR50, Appendix A, Criterion 3. The fire water suppression systems that are not within the scope of license renewal as identified in RAI 2.3.3.14-5 are systems that are used only for property protection.

LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation in this document. Any other statements in this letter are provided for information purposes and are not considered regulatory commitments. Please direct questions regarding these commitments to Mr. Kevin Moles, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4126.

	COMMITMENT SUBJECT	LRA Section	COMMITMENT DESCRIPTION
35	LRA Amendment	N/A	License Renewal Application changes discussed in ET 07-0028 will be submitted in an amendment to the application. Reference: ET 07-0028 Due: August 31, 2007