

January 4, 2008

LICENSEE: Wolf Creek Nuclear Operating Corporation (WCNOC, the licensee)
FACILITIES: Wolf Creek Generating Station
SUBJECT: MEETING WITH REPRESENTATIVES OF WOLF CREEK NUCLEAR
OPERATING CORPORATION FOR WOLF CREEK GENERATING STATION
(TAC NO. MD0197)

A meeting was held on Wednesday, November 28, 2007, between the Nuclear Regulatory Commission (NRC) staff and the licensee for Wolf Creek Generating Station (WCGS). The meeting was held at the request of the NRC staff to have the licensee address the NRC staff's key issues for discussion on the licensee's response dated September 27, 2007, to the second request for additional information (RAI) on the license amendment request (LAR) to revise Technical Specification (TS) 5.5.9, "Steam Generator (SG) Tube Surveillance Program." The LAR is to exclude portions of the SG tube below the top of the tubesheet in the SGs from periodic tube inspections based on the application of structural analysis and leak-rate evaluation results to re-define the primary-to-secondary pressure boundary. The notice for the meeting was issued on November 8, 2007. The licensee submitted its LAR application by letter dated February 21, 2006, and a response letter dated May 3, 2007, to the NRC staff's first RAI on the application that was discussed in the previous meeting held with the licensee on July 11, 2007.

The licensee's letters dated February 21, 2006, and May 3, and September 27, 2007, can be found through the NRC public home page under the Agencywide Documents Access and Management System ADAMS Accession Nos. ML060600454, ML071290104, and ML072750610, respectively. The meeting summary for the July 11, 2007, meeting was issued on August 7, 2007 (ADAMS Accession No. ML071980203). The meeting notice issued November 8, 2007, is under ADAMS Accession No. ML073090127. The key issues that the licensee was requested to address in the meeting were provided to the licensee in an email dated November 20, 2007, and docketed in a memorandum under ADAMS Accession No. ML073250003.

The purpose of the November 28, 2007, meeting was to ensure that the licensee understood the information needed by the NRC staff to complete its review of the licensee's application dated February 21, 2006. Enclosure 1 is the list of attendees. Enclosure 2 is the material handed out by the NRC staff. This enclosure lists the key issues that were given to the licensee on November 20, 2007, in preparation for the meeting, as discussed in the previous paragraph. Enclosure 2 also has the handout from the licensee. The agenda for the meeting was the following:

- Introductions/Purpose of Meeting
- Licensee Presentation (Enclosure 3)
- NRC Staff Presentation (Attachment to Agenda in Enclosure 2)

- Comments, Questions, and Discussion
- Public Comments

The NRC staff and the licensee provided opening statements. The NRC staff stated that its review of the licensee's application is in its second year and has necessitated that the NRC staff identify the key issues it has in its review of the licensee's LAR (Enclosure 2). Because of this and to expedite the NRC staff's review, the meeting was requested to ensure that the licensee understood what information was needed by the NRC staff to address the key issues and complete its review of the LAR. After this meeting, the NRC staff intended to determine if it believed that there was a success path to approve the LAR and, if so, what questions would need to be answered by the licensee to provide the basis for NRC to issue an amendment. If no success path could be seen, then the NRC would issue its evaluation to deny the LAR. The decision of the NRC staff would be provided to the licensee as soon as practicable but no later than 2 weeks after the meeting.

The licensee thanked the NRC for having the meeting because it also wanted to expedite the NRC review because this amendment was needed for the upcoming spring 2008 refueling outage for WCGS. The current TS 5.5.9 will not allow the licensee to conduct SG tube inspections in the refueling outage and restart from the outage. It also stated that it believed that the conservatism in the calculation of the H*/B* distance values, which define the inspection distance of the tube down through the tubesheet and re-define the primary-to-secondary pressure boundary, that have been proposed for the WCGS TSs were more than sufficient to approve the proposed values and it was ready to do what was necessary to demonstrate this to the NRC staff. Westinghouse Electric Company (WEC) was included in the meeting because it is the licensee's contractor that performed the calculations to determine the H*/B* values that were submitted by the licensee.

The licensee began its presentation. The slides are in Enclosure 2. The handout did not contain any proprietary information. The licensee presented what it viewed as the objective of the meeting and the history of the licensee's submittals for the LAR. It provided a chart of the bases for the three different submittals and the differences to explain why the proposed H*/B* values have increased with each submittal. The changes were not due to mistakes in the analyses used to calculate the H*/B* values, but in the increased conservatisms used in the analyses. The licensee and WEC stated that, since the criteria that NRC was applying to its review of the LAR were uncertain, the increasing conservatism being assumed was their attempt to propose H*/B* values that were acceptable to the NRC staff.

The analysis bases for the application dated February 21, 2007; the first RAI response letter dated May 3, 2007; and the second RAI response letter dated September 27, 2007, were discussed. The licensee's conclusions were the following:

1. The performance criteria are met for the entire bundle after implementation of the H*/B* criteria in the WCGS SGs.
2. Significant new crevice pressure test data influenced the analysis results but did not change the underlying methodology. This test data was not available when the licensee's application was submitted on February 21, 2006, but was available and was used in the May 3, 2007, submittal.

3. The NRC RAIs have raised new significant issues on the divider plate, thermal expansion coefficients, and calculation parameter uncertainties.
4. Technical completeness requires the introduction of published but not credible data (e.g., incremental tube slippage under low-load conditions). The forces on the SG tubes in normal operating conditions and postulated accidents are not in a direction to cause the tubes to slip.
5. The acceptable and justifiable H^*/B^* distances are less than the values proposed for TS 5.5.9 in the September 27, 2007, submittal.

In its presentation, the NRC staff explained the basis for its key issues with respect to the licensee's LAR, which are listed in Enclosure 2. The NRC staff's goal is to complete its review by February 2008, within the NRR 2-year goal for LARs; however, these issues need to be resolved for the NRC staff to approve the LAR. This meeting was held to expedite the resolution of these issues by allowing the NRC staff to determine if there is a basis to conclude that the key issues can be resolved.

Following the discussion on the NRC staff's key issues, the NRC caucused. Following the caucus, the NRC staff stated that the discussion on the key issues showed that it was necessary for the NRC staff reviewers to sit down with WEC to go over the calculations used to determine the H^*/B^* values. It was decided that this was needed to expeditiously resolve the NRC staff's key issues on the LAR in a manner that, if additional information was needed by the NRC to provide a basis to approve the amendment, the questions would be precise and direct on point to what was needed to justify the amendment. In stating this, the NRC staff also made the qualification that if additional questions were asked of the licensee, there may be questions that do not fall within the key issues identified by the staff because in preparing for this meeting, the staff had not completed its review of the licensee's submittal dated September 27, 2007. However, the NRC staff stated that any additional questions would be minor in nature.

The licensee and the NRC staff agreed that there would be a meeting in the next week at NRC headquarters or at WEC to have a detailed discussion on the analysis and calculations done to justify the proposed H^*/B^* distances. Following this meeting, the NRC staff stated that it would evaluate whether there is a success path to approve the amendment, and provide its decision to the licensee within two weeks of that meeting. [A meeting was scheduled to be held at Westinghouse offices in Madison, Pennsylvania, on December 6, 2007; however, the meeting was canceled because of weather conditions and re-scheduled for December 13, 2007.]

Ten members of the public were in attendance. They were given the opportunity to ask questions of the NRC staff. During the meeting, a Public Meeting Feedback form was made available to each person. Any comments received in the future on this meeting will be forwarded to the NRR Senior Communications Analyst, who will forward them to the Office of the Executive Director for Operations. Several members of the public that are members of licensees having nuclear power plants with SGs, stated the importance of NRC resolving its differences with WCGS so that permanent TS changes similar to what has been proposed by WCGS can be approved. Such TS changes are needed to prevent the unnecessary replacement of SGs at other plants.

- 4 -

Direct any inquiries about this meeting to me at 301-415-1307, or by electronic mail at jnd@nrc.gov.

/RA/

Jack Donohew, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosures: 1. List of Attendees at Meeting
2. NRC Staff's and Licensee's Handouts

cc w/encls: See next page

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ADAMS Accession No. Pkg ML073400171, Summary ML073370045, Handouts ML073340356

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/DCI/CSGB/BC	NRR/LPL4/BC
NAME	JDonohew	JBurkhardt	AHiser	THiltz, MCT for
DATE	12/11/07	12/7/07	12/21/07	1/4/08

OFFICIAL RECORD COPY

LIST OF ATTENDEES AT MEETING OF NOVEMBER 18, 2007

WITH WOLF CREEK NUCLEAR OPERATING CORPORATION

<u>NAME</u>	<u>AFFILIATION</u>
J. Donohew	NRC/NRR/LPLIV
J. Lubinski	NRC/NRR/DORL
T. Hiltz	NRC/NRR/LPLIV
W. Bateman	NRC/NRR/DCI
A. Hiser	NRC/NRR/CSGB
E. Murphy	NRC/NRR/CSGB
A. Johnson	NRC/NRR/CSGB
M. Stambaugh	NRC/NRR/CSGB
K. Karwoski	NRC/NRR/DCI
T. Garrett	WCNOC
S. Wideman	WCNOC
P. Wagner	WCNOC
H. Lagally	WEC
G. Whiteman	WEC
C. Cassino	WEC
H. Cothron	EPRI
M. Behraves	EPRI
W. Moore	SNOC
R. Graham	SNOC
D. Crawley	SNOC
P. Fabian	PSEG
D. Chrzanowski	Exelon (by conference phone)
S. Leshnoff	Exelon
D. Mayes	Duke
M. Melton	NEI

Where:

Duke	=	Duke Energy Company
EPRI	=	Electric Power Research Institute
Exelon	=	Exelon Generating Company
FPL	=	Florida Power & Light
LPLIV	=	Plant Licensing Branch IV
NEI	=	Nuclear Energy Institute
NRC	=	Nuclear Regulatory Commission
NRR	=	Office of Nuclear Reactor Regulation
PSEG	=	Public Service Electric & Gas Company
SNOC	=	Southern Nuclear Operating Company
WCNOC	=	Wolf Creek Nuclear Operating Corporation
WEC	=	Westinghouse Electric Company

NRC STAFF'S AND LICENSEE'S HANDOUTS FOR NOVEMBER 28, 2007, MEETING

ADAMS ACCESSION NO. ML073340356

The steam generator (SG) tube inspection license amendment request (LAR) was submitted in the licensee's application dated February 21, 2006, as supplemented by letters dated May 3, and September 27, 2007. These documents are under the NRC Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML060600456, ML071290104, and ML072750610, respectively.

The first attachment is the handout from the NRC staff at the meeting, which includes the following:

1. Agenda from meeting notice issued November 8, 2007 for the meeting (ADAMS Accession No. ML073090127).
2. One page containing six comments to be addressed by the licensee in the meeting and that were sent to the licensee in an email dated November 20, 2007 (ADAMS Accession No. ML073250003).

The second attachment is the handout from the licensee entitled "NRC/WCNOC Meeting SG Tube Inspection LAR [Date of Meeting] 11/28/07."

ENCLOSURE 2

Wolf Creek Generating Station

cc:

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February 2006