

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Terry J. Garrett
Vice President, Engineering

March 30, 2008

ET 08-0024

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

- Reference: 1) Letter ET 08-0009, dated February 8, 2008, from T. J. Garrett, WCNOC, to USNRC
- 2) Letter ET 08-0016, dated March 21, 2008, from T. J. Garrett, WCNOC, to USNRC
- Subject: Docket No. 50-482: Supplemental Information Related to License Amendment Request for an Interim Alternate Repair Criterion to Technical Specification 5.5.9, "Steam Generator (SG) Program"

Gentlemen:

Reference 1 provided Wolf Creek Nuclear Operating Corporation's (WCNOC) application to revise Technical Specification (TS) 5.5.9, "Steam Generator (SG) Program," that proposed a one cycle revision to incorporate an interim alternate repair criterion (IARC) in the provisions for SG tube repair criteria during Refueling Outage 16 and the subsequent operating cycle. Reference 2 provided WCNOC's response to the Nuclear Regulatory Commission (NRC) request for additional information (RAI) provided by electronic mail on February 28, 2008, including four additional questions that were provided to Southern Nuclear Operating Company by electronic mail on March 10, 2008.

In the response to question 13 in Reference 2, WCNOC indicated that an administrative limit would be established to not exceed the calculated steam line break leakage value. On March 26, 2008, during a teleconference with the NRC Project Manager, it was identified that a regulatory commitment was required since the NRC safety evaluation for the requested amendment was relying on the use of a constant multiplier of 2.5 to calculate a steam line break administrative limit. Attachment I provides additional details.

A001

KRR

The additional information provided in the Attachments does not impact the conclusions of the No Significant Hazards Consideration provided in Reference 1. In accordance with 10 CFR 50.91, a copy of this submittal is being provided to the designated Kansas State official.

Attachment II contains a list of regulatory commitments. If you have any questions concerning this matter, please contact me at (620) 364-4084, or Mr. Richard D. Flannigan at (620) 364-4117.

Sincerely,



Terry J. Garrett

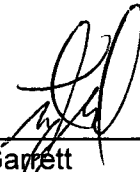
TJG/rit

Attachment I - Supplemental Information Related to License Amendment Request for an
Interim Alternate Repair Criterion
II - List of Regulatory Commitments

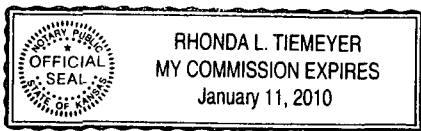
cc: E. E. Collins (NRC), w/a
T. A. Conley (KDHE), w/a
J. N. Donohew (NRC), w/a
V. G. Gaddy (NRC), w/a
B. K. Singal (NRC), w/a
Senior Resident Inspector (NRC), w/a

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 30th day of March, 2008.



Rhonda L. Tiemeyer
Notary Public

Expiration Date January 11, 2010

Supplemental Information Related to License Amendment Request for an Interim Alternate Repair Criterion

Reference 1 provided Wolf Creek Nuclear Operating Corporation's (WCNOC) application to revise Technical Specification (TS) 5.5.9, "Steam Generator (SG) Program," that proposed a one cycle revision to incorporate an interim alternate repair criterion (IARC) in the provisions for SG tube repair criteria during Refueling Outage 16 and the subsequent operating cycle. Reference 2 provided WCNOC's response to the Nuclear Regulatory Commission (NRC) request for additional information (RAI) provided by electronic mail on February 28, 2008, including four additional questions that were provided to Southern Nuclear Operating Company by electronic mail on March 10, 2008.

In the response to question 13 in Reference 2, WCNOC indicated that an administrative limit would be established to not exceed the calculated steam line break leakage value. On March 26, 2008, during a teleconference with the NRC Project Manager, it was identified that a regulatory commitment was required since the NRC safety evaluation for the requested amendment was relying on the use of a constant multiplier of 2.5 to calculate a steam line break administrative limit. Specifically, the response to question 13 stated, in part:

For integrity assessments, the ratio of 2.5 will be used in the completion of both the condition monitoring (CM) and operational assessment (OA) upon implementation of the IARC. For example, for the CM assessment, the component of leakage from the lower 4 inches for the most limiting steam generator during the prior cycle of operation will be multiplied by a factor of 2.5 and added to the total leakage from any other source and compared to the allowable accident analysis leakage assumption. For the OA, the difference in leakage from the allowable limit during the limiting design basis accident minus the leakage from the other sources will be divided by 2.5 and compared to the observed leakage. An administrative limit will be established to not exceed the calculated value.

As such, WCNOC considers the above to be a regulatory commitment.

References:

1. WCNOC letter ET 08-0009, "Revision to Technical Specification (TS) 5.5.9, "Steam Generator (SG) Program" for Interim Alternate Repair Criteria," February 8, 2008.
2. WCNOC letter ET 08-0016, "Response to Request for Additional Information Related to License Amendment Request for an Interim Alternate Repair Criterion to Technical Specification 5.5.9, "Steam Generator (SG) Program"," March 21, 2008.

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by WCNOG in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Richard Flannigan at (620) 364-4117.

COMMITMENT	Due Date/Event
For integrity assessments, the ratio of 2.5 will be used in the completion of both the condition monitoring (CM) and operational assessment (OA) upon implementation of the IARC. For example, for the CM assessment, the component of leakage from the lower 4 inches for the most limiting steam generator during the prior cycle of operation will be multiplied by a factor of 2.5 and added to the total leakage from any other source and compared to the allowable accident analysis leakage assumption. For the OA, the difference in leakage from the allowable limit during the limiting design basis accident minus the leakage from the other sources will be divided by 2.5 and compared to the observed leakage. An administrative limit will be established to not exceed the calculated value.	A CM Report and preliminary OA will be prepared prior to MODE 4