

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

March 12, 2009

Mr. Rick A. Muench President and Chief Executive Officer Wolf Creek Nuclear Operating Corporation Post Office Box 411 Burlington, KS 66839

SUBJECT: WOLF CREEK GENERATING STATION – REQUEST FOR ADDITIONAL INFORMATION RE: REVISION TO TECHNICAL SPECIFICATION (TS) 3.3.2, 'ENGINEERED SAFETY FEATURE ACTUATION SYSTEM," TS. 3.7.2, "MAIN STEAM ISOLATION VALVES," AND ADDITION OF NEW TS 3.7.19, "SECONDATY SYSTEM ISOLATION VALVES" (TAC NO. MD9469)

Dear Mr. Muench:

By letter dated August 14, 2008 (Agencywide Document Access and Management System (ADAMS) Accession No. ML082350068), Wolf Creek Nuclear Operating Corporation (WCNOC) submitted a license amendment request (LAR) to incorporate changes into the Wolf Creek Generating Station (WCGS) Technical Specifications (TS). The proposed amendment would revise TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," TS 3.7.2, "Main Steam Isolation Valves (MSIVs)," and add new TS 3.7.19, "Secondary System Isolation Valves (SSIVs)."

Based on its review, the U.S. Nuclear Regulatory Commission (NRC) has determined that additional information is required to complete its evaluation of the LAR. The enclosure to this letter provides the NRC request for additional information (RAI) that was sent to Ms. Diane Hooper and Mr. Steve Wideman of WCNOC via e-mail on February 13, 2009, and discussed with WCNOC staff on February 13, 2009. Based on discussions with Ms. Hooper on February 13, 2009, it was agreed that WCNOC will provide its RAI response within 30 days from the date of issuance of this letter.

R. Muench

The NRC staff considers that timely responses to RAIs help ensure sufficient time is available for the NRC staff to complete its review and contribute toward the NRC's goal of efficient and effective use of staff resources.

Sincerely,

Balwant K. Singal, Senior Project Manager

Balwant K. Singal, Senior Project Manager Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosure

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

REVISION TO TECHNICAL SPECIFICATIONS (TS) 3.3.2 AND 3.7.2

AND ADDITION OF TS 3.7.19

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

By letter dated August 14, 2008 (Agencywide Document Access and Management System (ADAMS) Accession No. ML082350068), Wolf Creek Nuclear Operating Corporation (WCNOC) submitted a license amendment request (LAR) to incorporate changes into the Wolf Creek Generating Station (WCGS) Technical Specifications (TS). The proposed amendment would revise TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," TS 3.7.2, "Main Steam Isolation Valves (MSIVs)," and add new TS 3.7.19, "Secondary System Isolation Valves (SSIVs)."

Based on its review, the U.S. Nuclear Regulatory Commission (NRC) has determined that following additional information is required to complete its evaluation of the LAR.

Request for Additional Information

Attachments I and IV of the LAR state that the specified safety function of the SSIVs is to isolate the plant's secondary side following a main feed line or main steam line break, and to ensure the required flow of auxiliary feed water to the intact steam generators. When one or more SSIVs are inoperable, proposed TS 3.7.19 would require the affected valves to be closed or isolated within 7 days and verified closed or isolated once per 7 days.

The justification for the 7-day completion time provided in LAR Attachments I and IV is:

- a. The low probability of an event occurring during the completion time.
- b. Operating experience.
- c. Engineering judgment.

WCNOC did not provide detailed discussion or quantification of the justification in the LAR or its attachments.

Existing TS 3.7.3 Required Actions G.1 and G.2, and H.1 and H.2 contain requirements for valves with a similar safety function to the SSIVs, namely, the main feedwater regulating valves (MFRVs) and the MFRV bypasses. When one or more MFRVs or MFRV bypasses are inoperable, TS 3.7.3 requires the affected valves to be closed or isolated within 72 hours and verified closed or isolated once per 7 days.

The justification for the 72-hour completion time for TS 3.7.3 Required Actions G.1 and G.2, and H.1 and H.2 provided in the bases for TS 3.7.3 consists of:

- a. The redundancy of the remaining operable valves.
- b. The low probability of an event occurring during the completion time.
- c. Operating experience.

It appears that the proposed completion time for TS 3.7.19 Required Actions A.1 and A.2 is less restrictive than completion times for required actions for equipment with similar safety functions. The justification for the less restrictive completion times contained in the LAR and attachments does not appear to be adequate.

You are requested to provide adequate detailed justification for the less restrictive 7-day completion time for proposed TS 3.7.19 Required Actions A.1 and A.2.

R. Muench

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Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

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ADAMS Accession No.: ML090620129

*Memo dated 2/18/09

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/ITSB	NRR/LPL4/BC	NRR/LPL4/PM
NAME	BSingal	JBurkhardt	REIliot*	MMarkley MGK for	BSingal
DATE	3/11/09	3/9/09	2/18/09	3/12/09	3/12/09

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