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

March 12, 2010

Mr. Matthew W. Sunseri
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 ON LICENSE AMENDMENT REQUEST FOR REVISION TO TECHNICAL SPECIFICATION 3.8.1, "AC SOURCES – OPERATING" (TAC NO. ME2675)

Dear Mr. Sunseri:

By letter dated November 20, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML093310430), Wolf Creek Nuclear Operating Corporation (WCNOC, the license) requested approval to revise Technical Specification (TS) 3.8.1, "AC [Alternating Current] Sources – Operating." The licensee is proposing to add a note to Required Actions B.3.1 and B.3.2 to indicate that the TS 3.8.1 Required Actions B.3.1 and B.3.2 are satisfied if the diesel generator (DG) becomes inoperable due to an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing. The licensee has also proposed to revise the Completion Time for Required Actions B.3.1 and B.3.2 to specify a Completion Time based on the time from discovery of an issue requiring common cause failure determination.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided by the licensee and determined that additional information is needed in order to complete the review. A draft copy of the request for additional information (RAI) was forwarded to Ms. Diane Hooper of your staff on February 3, 2010, via e-mail. Mr. Steve Wideman of your staff confirmed on February 16, 2010, that WCNOC staff understands the request and no further clarifications are needed. Mr. Wideman also agreed to provide the final RAI response within 30 days from the date of this letter.

If you have any questions, please contact me at 301-415-3016 or via e-mail at balwant.singal@nrc.gov.

Sincerely,

Balwant K. Singal

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
As stated

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REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST

TECHNICAL SPECIFICATIONS 3.8.1, "AC SOURCES OPERATING"

WOLF CREEK GENERATING STATION

WOLF CREEK NUCLEAR OPERATING CORPORATION

DOCKET NO. 50-482

1. The Wolf Creek Generating Station (WCGS) Technical Specification (TS), 1.3, "Completion Times," DESCRIPTION, states the following:

> The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO [Limiting Condition for Operation]. Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

Question 1a

Given the existing Completion Time of 24 hours, please explain how the proposed revision to the Completion Time for Required Actions B.3.1 and B.3.2 of TS 3.8.1 is compliant with WCGS TS LCO 3.0.2, and consistent with the TS 1.3, Completion Time, time of discovery description.

Question 1b

Please explain the unique WCGS design requiring the proposed Completion Time change for performance of LCO 3.8.1, Condition B, Required Actions B.3.1 and B.3.2.

2. The WCGS TS 1.1, "Definitions," defines OPERABLE--OPERABILITY as follows:

> A system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).

The objective of LCO 3.8.1, Required Actions B.3.1 and B.3.2 is to ensure that a failure of a diesel generator (DG) does not affect the opposite train DG capability to perform its specified safety function(s) (i.e., verify OPERABILITY of the opposite train DG).

Question 2a

Please explain how the term OPERABILITY, as defined by WCGS TS 1.1, will be determined for the OPERABLE DG with the proposed note stating: "Not applicable if result of support system, independently testable component, or preplanned preventative maintenance or testing."

Question 2b

Please explain how it can be ensured that a failure of a DG support system or independently testable component does not affect the OPERABILITY of the opposite train DG if the Required Actions of 3.8.1, Condition B, Required Actions B.3.1 or B.3.2 are not performed as currently required.

Question 2c

Please state what specific DG support instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment, that are required for the DG perform its specified safety function(s), will be covered by the proposed exception to TS 3.8.1 Condition B, Required Actions B.3.1 and B.3.2.

Question 2d

Please identify all "issues" affecting DG OPERABILITY that would not require a common cause failure determination and, for each issue, explain how TS OPERABILITY is met as defined above.

3. The WCGS TS Bases 3.8.1, Condition B, Required Actions B.3.1 and B.3.2 state:

> Required Action B.3.1 provides an allowance to avoid unnecessary testing of OPERABLE DG. If it can be determined that the cause of the inoperable DG does not exist on the OPERABLE DG, SR [Surveillance Requirement] 3.8.1.2 does not have to be performed. If the cause of inoperability exists on the other DG, it would be declared inoperable upon discovery and Condition F of LCO 3.8.1 would be entered.

Additionally, page 7 of 12 of the license amendment request (LAR) submittal, Section 3.6, Evaluation, states in part:

> In GL [Generic Letter] 93-05 [Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation – Generic Letter 93-05"], the NRC [U.S. Nuclear Regulatory Commission] staff stated that, in performing the study documented in NUREG-1366 ["Improvements to Technical Specifications

> Surveillance Requirements," dated December 1992], the safety can be improved, equipment degradation [de]creased, and unnecessary burden on personnel eliminated by reducing the frequency of certain testing required in the TS during power operation. The changes eliminate testing that is likely to cause transients or excessive wear of equipment."

Question 3

Based on WCGS TS 3.8 Bases and the excerpt taken from the LAR, please explain why performance of a common cause failure determination on the OPERABLE DG, currently allowed by the WCGS TS as an alternative to performance of TS SR 3.8.1.2, does not provide a reasonable alternative to verify OPERABILITY of the opposite train DG and, therefore, the intent of GL 93-05.

If you have any questions, please contact me at 301-415-3016 or via e-mail at balwant.singal@nrc.gov.

Sincerely,

/RA/

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
As stated

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ADAMS Accession No.: ML100610504 **Memo dated 2/22/10**

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