



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

March 5, 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 - ISSUANCE OF AMENDMENT RE:
REVISION TO TECHNICAL SPECIFICATION 3.3.2, "ENGINEERED SAFETY
FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION"
(EMERGENCY CIRCUMSTANCES) (TAC NO. ME3465)

Dear Mr. Sunseri:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 187 to Renewed Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS). The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated March 3, 2010, as supplemented by letter dated March 4, 2010.

The amendment revises TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," Condition J, Required Action J.1, and associated Note for the start of the motor-driven auxiliary feedwater pumps on the trip of all main feedwater (MFW) pumps. Wolf Creek Nuclear Operating Corporation has determined that the design and normal operation of the MFW pumps at WCGS could result in a condition that does not conform to TS Table 3.3.2-1, Function 6.g and the proposed TS changes are needed to address this condition. The license amendment is issued under emergency circumstances as provided in the provisions of paragraph 50.91(a)(5) of Title 10 of the *Code of Federal Regulations* due to the time critical nature of the amendment. In particular, the plant not be able to resume operation up to the plant's licensed power level without NRC approval of this amendment.

A copy of our related Safety Evaluation is enclosed. The Safety Evaluation describes the emergency circumstances under which the amendment was issued and the final determination of no significant hazards. A Notice of Issuance, addressing the final no significant hazards

M. Sunseri

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determination and opportunity for a hearing, associated with the emergency circumstances, will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,



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

Docket No. 50-482

Enclosures:

1. Amendment No. 187 to NPF-42
2. Safety Evaluation

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

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 187
License No. NPF-42

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Wolf Creek Generating Station (the facility) Renewed Facility Operating License No. NPF-42 filed by the Wolf Creek Nuclear Operating Corporation (the Corporation), dated March 3, 2010, as supplemented by letter dated March 4, 2010, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

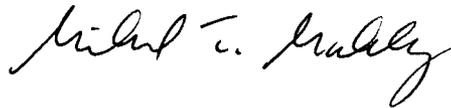
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-42 is hereby amended to read as follows:

- (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 187, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. The Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 10 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Michael T. Markley, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License and
Technical Specifications

Date of Issuance: March 5, 2010

ATTACHMENT TO LICENSE AMENDMENT NO. 187
RENEWED FACILITY OPERATING LICENSE NO. NPF-42
DOCKET NO. 50-482

Replace the following pages of the Renewed Facility Operating License No. NPF-42 and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change. The corresponding overleaf pages are provided to maintain document completeness.

Renewed Facility Operating License

<u>REMOVE</u>	<u>INSERT</u>
4	4

Technical Specifications

<u>REMOVE</u>	<u>INSERT</u>
3.3-26	3.3-26

- (5) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission, now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Maximum Power Level
- The Operating Corporation is authorized to operate the facility at reactor core power levels not in excess of 3565 megawatts thermal (100% power) in accordance with the conditions specified herein.
- (2) Technical Specifications and Environmental Protection Plan
- The Technical Specifications contained in Appendix A, as revised through Amendment No. 187, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. The Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
- (3) Antitrust Conditions
- Kansas Gas & Electric Company and Kansas City Power & Light Company shall comply with the antitrust conditions delineated in Appendix C to this license.
- (4) Environmental Qualification (Section 3.11, SSER #4, Section 3.11, SSER #5)*
- Deleted per Amendment No. 141.

*The parenthetical notation following the title of many license conditions denotes the section of the supporting Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>J. One or more Main Feedwater Pump trip channel(s) inoperable.</p>	<p>-----NOTE----- One inoperable channel may be bypassed for up to 2 hours for surveillance testing of other channels. -----</p> <p>J.1 Place channel(s) in trip. <u>OR</u> J.2 Be in MODE 3.</p>	<p>1 hour 7 hours</p>
<p>K. One channel inoperable.</p>	<p>-----NOTE----- One additional channel may be tripped for up to 12 hours for surveillance testing. -----</p> <p>K.1 Place channel in bypass. <u>OR</u> K.2.1 Be in MODE 3. <u>AND</u> K.2.2 Be in MODE 5.</p>	<p>72 hours 78 hours 108 hours</p>

(continued)



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 187 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-42

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

1.0 INTRODUCTION

By application dated March 3, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100640044), as supplemented by letter dated March 4, 2010 (ADAMS Accession No. ML100640141), Wolf Creek Nuclear Operating Corporation (WCNOC, the licensee) requested changes to the Technical Specifications (TSs, Appendix A to Renewed Facility Operating License No. NPF-42) for the Wolf Creek Generating Station (WCGS).

The proposed amendment would revise TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," Condition J, Required Action J.1, and associated Note for the start of the motor-driven auxiliary feedwater (MDAFW) pumps on the trip of all main feedwater (MFW) pumps. WCNOC has determined that the design and normal operation of the MFW pumps at WCGS could result in a condition that does not conform to TS Table 3.3.2-1, Function 6.g and the proposed TS changes are needed to address this condition. The proposed changes to Condition J would allow placing the channels in a tripped condition for the two channels on one MFW pump when placing the pump into service or removing the pump from service prior to resetting the MFW pump. With the revision to Condition J, WCGS will not require an entry into Limiting Condition for Operation (LCO) 3.0.3.

2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act requires applicants for nuclear power plant operating licenses to include TSs as part of the license. The Commission's regulatory requirements related to the content of the TSs are contained in Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.36, "Technical specifications." The TS requirements in 10 CFR 50.36 include the following categories: (1) safety limits, limiting safety systems settings and control settings, (2) LCOs, (3) surveillance requirements, (4) design features, and (5) administrative controls. The requirements for the auto-start of the auxiliary feedwater (AFW) resulting from an MFW pump trip are included in the TSs in accordance with 10 CFR 50.36(c)(2), "Limiting conditions for operation."

As stated in 10 CFR 50.59(c)(1)(i), a licensee is required to submit a license amendment pursuant to 10 CFR 50.90 if a change to the TS is required. Furthermore, the requirements of 10 CFR 50.59 necessitate that the NRC approve the TS changes before the changes are implemented. WCNO's submittals meet the requirements of 10 CFR 50.59(c)(1)(i) and 10 CFR 50.90.

General Design Criterion (GDC) 13, "Instrumentation and control," of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50 requires, among other things, that instrumentation shall be provided to monitor variables and systems over their anticipated ranges for normal operation, for anticipated normal occurrences, and for accident conditions as appropriate to assure adequate safety, including those variables and systems that can affect the fission process, the integrity of the reactor core, the reactor coolant pressure boundary, and the containment and its associated systems. Appropriate controls shall be provided to maintain these variables and systems within prescribed operating ranges.

GDCs 20 through 29 in 10 CFR Part 50, Appendix A, Section III, "Protection and Reactivity Control Systems," provide requirements for:

- Protection system functions;
- Protection system reliability and testability;
- Protection system independence;
- Protection system failure modes;
- Separation of protection and control systems;
- Protection system requirements for reactivity control malfunctions;
- Reactivity control system redundancy and capability;
- Combined reactivity control systems capability;
- Reactivity limits; and
- Protection against anticipated operational occurrences.

3.0 TECHNICAL EVALUATION

3.1 Background

3.1.1 Description of the Condensate and Feedwater Systems

As described in the Updated Safety Analysis Report (USAR), the condensate and feedwater system (CFS) is designed to supply a sufficient quantity of water at a required temperature and pressure to the four steam generators (SGs) during plant startup, shutdown, and normal operating conditions. The CFS also provides a safety function of isolation of feedwater to the SGs in design-basis accidents. The CFS includes three condensate pumps, two 67 percent capacity turbine-driven steam generator feedwater pumps, and one 480 gallon per minute (gpm) capacity motor-driven feedwater pump (MDFP) to provide feedwater at low power (approximately 1.5 percent) until there is adequate steam flow to operate the MFW pumps.

The MFW pumps operate in parallel and discharge to the high-pressure feedwater heaters. The pumps take suction following the No. 4, low-pressure feedwater heaters and discharge through the high-pressure feedwater heaters to the SGs. Each MFW pump is steam-driven with independent speed-control units. Steam for the turbines is supplied from the main steam

header at low loads and from the moisture separator reheater outlet during normal operation. Because there is no steam or low-steam pressure supply during startup, one MDFP is provided to supply feedwater to the SGs during startup and shutdown conditions.

3.1.2 Description of the AFW System

As described by the USAR, the AFW system is a safety-related system designed to supply sufficient feedwater to the SGs to remove thermal energy from the reactor coolant system (RCS) in the event of a loss of the MFW supply. During startup operation, feedwater can be provided to the SGs using the CFS system or the AFW system. The AFW system may also be used following a reactor shutdown in conjunction with the condenser dump valves or atmospheric relief valves, to cool the RCS. The AFW system is not required during normal power generation and the pumps are in standby. The AFW system includes two 100 percent capacity (575 gpm) MDAFW pumps and one 200 percent capacity (1,145 gpm) turbine-driven (TDAFW) pump. Each of the two MDAFW pumps supply two SGs, and the TDAFW pump can supply all four SGs. The minimum AFW flow rate of 563 gpm is required, to fulfill the acceptance criteria for the feedline break analysis.

The licensee's safety analysis assumes that a total of 700 gpm, evenly delivered to four SGs, within 433 seconds is sufficient to reverse the SG inventory reduction and will meet the safety design criteria, preventing overpressurizing the RCS, which could lead to uncovering the reactor core.

An automatic actuation signal for the MDAFW pump is generated from trip of both MFW pumps, two out of four low-low level signals in any one SG, anticipated transient without scram (ATWS) Mitigation System Activation Circuitry (AMSAC), or a manual initiation. The TDAFW pump is started on a loss-of-offsite power (LOOP), low-low level in any two SGs, AMSAC, or a manual initiation.

3.1.3 Anticipatory Start of the MDAFW Pumps upon Trip of Both MFW Pumps

A trip of both MFW pumps will result in an anticipatory start of the MDAFW pumps. Each MFW pump is equipped with two pressure switches on the high-pressure control header for the turbine control system. One pressure switch on each pump is powered by separation group 1 and a second pressure switch on each pump is powered by separation group 4. If the two pressure switches in the same separation group, one on each pump, sense a low pressure, then a signal will be generated that a trip has occurred of both MFW pumps. This condition indicates that feedwater is no longer being supplied to the SGs. Upon a loss of both MFW pumps, engineered safety features actuation system (ESFAS) instrumentation will signal an automatic start of both MDAFW pumps. The anticipatory start of the AFW pumps is a design feature to lessen the effects of a loss-of-feedwater transient.

A manual block of the MFW pump trip signal to start AFW is provided at the main control board. This block permits startup and shutdown of the MFW pumps while in Mode 2, without an automatic start of the AFW pumps. With the block enabled, the AFW pumps still remain available to respond to a start from any other valid start signal.

The MFW pump trip AFW auto-start logic channel is operable if the pressure switches can accurately detect a low pressure condition, indicative that a MFW pump is not providing feedwater. Otherwise, a channel can be placed in the trip condition, fulfilling its safety function by enabling half of the actuation logic.

Starting of the MFW pump requires the control switch to be placed in the "reset" condition. Reset allows high-pressure oil to pressurize the pump control header in order to open the turbine stop valves and enable the turbine control valves to respond to a demand signal. However, reset also pressurizes the low-pressure trip switches on the header, giving an input to the ESFAS logic that the MFW pump is supposedly operating and pumping feedwater to the SGs. Therefore, when the MFW pump turbine is in "reset," the MFW pump turbine control header oil pressure provides a false indication of an MFW pump's status because the MFW pump is not actively supplying flow to the SGs. If the operating MFW pump turbine trips, then all MFW would cease flow to the SGs, and since the non-operating MFW pump's oil control header remains pressurized, the ESFAS actuation logic would not be satisfied and the required auto-start signal to the MDAFW pumps would not be initiated.

3.1.4 Technical Specifications

The licensee's TSs require that the AFW auto-start function on MFW pump trip be operable in Mode 1, Power Operation, which is a plant condition with rated thermal power greater than 5 percent. This anticipatory trip results in the intact SGs being provided with water to provide a heat sink to remove reactor decay heat and sensible heat in the event of a loss-of-feedwater accident. In Mode 2, Startup, the ESFAS AFW actuation on an MFW pump trip is not required by TS and is normally blocked. The restoration of the AFW auto-start function happens after the first MFW pump is put into service while in Mode 2, just prior to entering Mode 1. The AFW auto-start actuation is not required in Modes 3, 4, and 5, because the MFW pumps are normally shut down, and an MFW pump trip would not be indicative of a condition requiring automatic AFW initiation.

When the MFW pump turbine is placed in reset, but is not providing flow to the SGs, both pressure channels for that pump are considered inoperable. The licensee's current TS do not have a provision for two channels inoperable on the same MFW pump. Therefore, with both channels inoperable, the licensee would be required to enter LCO 3.0.3.

3.1.5 Operation of MFW Pumps

Starting and stopping MFW pumps during plant startup and shutdown is a normal evolution accomplished within a short period of time. During low-power plant startup operations while in Mode 2, one MFW pump is placed in service while the AFW auto-start function is blocked. Power increase to enter Mode 1 requires the AFW auto-start upon trip of MFW pumps to be operable. To place the second MFW pump in service, the second MFW pump must be first placed in reset. During the time the second MFW pump is in reset, the ESFAS AFW auto-start function is non-functional. In order to resolve this condition, the licensee proposes a change to the TS to require placing the channel in trip when one or more channels are inoperable. During the starting of the second MFW pump, the licensee will place both channels for the MFW pump to be started in trip, enabling half of the AFW auto-start logic. If during this period the operating pump should experience a trip, then the safety function to auto-start the MDAFW pumps would

occur. Upon successful start of the second MFW pump, the licensee will remove the two channels from trip, making the pump trip logic fully operable in a normal operation configuration.

3.1.6 Safety Analysis

The auto-start of AFW on loss of MFW is an anticipatory safety function needed to mitigate the operational impact of loss-of-feedwater events. The AFW start from the loss of MFW pumps is not a requirement in the licensee's design basis event analyses. The design basis events that impose AFW safety function requirements are loss of normal feedwater, main feed line or main steam line break, LOOP, and small break loss-of-coolant accident. These design basis events assume auto-start of the AFW system in the event of a LOOP, a safety-injection (SI) signal, or low-low SG water level. Therefore, even though the auto-start of MDAFW pumps upon an MFW pump trip is an ESFAS function in TS Table 3.3.2-1, Function 6.g, the function is an anticipatory start signal and no credit is taken in any of the licensee's safety analysis described in its USAR.

3.2 Proposed Technical Specification Changes

3.2.1 Modify Condition J and Required Action J.1 for LCO 3.3.2

The current Condition J for LCO 3.3.2 states,

One Main Feedwater Pump trip channel inoperable, and Required Action J.1 states, Place channel in trip.

Revised Condition J would state,

One or more Main Feedwater Pump trip channel(s) inoperable, and Required Action J.1 would state, Place channel(s) in trip.

This change will accurately reflect the plant design of the two pressure switches on each of the MFW pump's high-pressure hydraulic oil control header (that provide one actuation signal in separation group 1 and one in separation group 4). The TS change will allow the licensee to put more than one channel in trip. Placing a channel in trip enables the safety function for that channel. Placing one or two channels in trip results in the channel(s) being in their safe configuration and enables half of the actuation logic for both trains. Placing one or two channels in trip will still result in MDAFW pump auto-start upon a trip of both MFW pumps. Therefore, changing the TS Required Action to place the inoperable channels in a trip condition puts the channel in a safe condition. This change allows the licensee to put both channels on one MFW pump in trip condition would prevent the licensee from having to enter LCO 3.0.3 with more than one channel inoperable. The licensee retains the safety function.

Based on the above discussion, the NRC staff concludes that the TS changes discussed above is acceptable.

3.2.2 Modify Note Associated with Required Actions J.1 and J.2 for LCO 3.3.2

The current Note associated with Required Actions J.1 and J.2 states,

The inoperable channel may be bypassed for up to 2 hours for surveillance testing of other channels.

Revised Note would state,

One inoperable channel may be bypassed for up to 2 hours for surveillance testing of other channels.

The change is needed to reflect the change to LCO 3.3.2, Condition J, as discussed in Section 3.2.1 of this safety evaluation and is acceptable.

3.3 Precedent

On March 4, 2009, the NRC staff issued Amendment No. 75 (ADAMS Accession No. ML090480566) to Facility Operating License No. NPF-90 for Watts Bar Nuclear Plant, Unit 1 (Watts Bar). The amendment resolved Watts Bar's noncompliance with the TSs for the ESFAS function associated with AFW automatic start upon trip on all MFW pumps.

On August 29, 2008, the NRC staff issued Amendment No. 312 (ADAMS Accession No. ML082401385) the Facility Operating License No. DPR-77 and Amendment No. 319 to Facility Operating License No. DPR-79 for Sequoyah Nuclear Plant, Units 1 and 2 (SQN). The amendments resolved SQN's NRC-identified noncompliance with the TSs for the ESFAS function associated with AFW automatic start upon trip on all MFW pumps.

Based on the above, the NRC staff concludes that the proposed revision to TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," meets requirements of GDCs 13, 20, 21, 22, 23, 24, 25, 26, 27, 28, and 29 and 10 CFR 50.36 and is, therefore, acceptable to the NRC staff.

4.0 EMERGENCY CIRCUMSTANCES

In its letter dated March 3, 2010, the licensee requested that the amendment be treated as an emergency amendment. In accordance with 10 CFR 50.91(a)(5), the licensee provided information regarding why this emergency situation occurred and how it could not be avoided.

Industry operating experience, OE30255, "Main Feedwater Pump "Reset" design feature provides incorrect Main Feedwater Pump Status to Emergency Feedwater Pump Initiation Circuitry Resulting in missed Technical Specification requirements," Oconee Nuclear Station, December 16, 2009, identified a design feature where MFW pump ESFAS logic could provide a status indication that the MFW pump is in service when the MFW pump may not actually be supplying water to the SG. If the MFW pump in service tripped, the MDAFW pumps would not receive an auto-start signal as required by the WCGS TSs. On January 21, 2010, WCNOOC determined that the TS issue described in this amendment request was applicable to WCGS.

WCNOC was in the process of preparing and submitting a routine TS amendment before the plant trip on March 2, 2010.

The license amendment is issued under emergency circumstances per the provisions of 10 CFR 50.91(a)(5) due to the time critical nature of the amendment. In particular, the plant not be able to resume operation up to the plant's licensed power level without NRC approval of this amendment. The NRC staff also evaluated whether the licensee took reasonable action to avoid the emergency situation. The licensee was already in the process of preparing and submitting a regular license amendment request; however, the need for the emergency amendment request arose due to an unexpected plant trip. The NRC staff concludes that the licensee's actions were reasonable and that the emergency situation could not have been avoided.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission may issue license amendments before the expiration of the 60-day period provided that its final determination is that the amendments involve no significant hazards consideration. This amendment is being issued prior to the expiration of the 60-day period. Therefore, a final finding of no significant hazards consideration follows.

The Commission has made a final determination that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendment does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

As required by 10 CFR 50.91(a), in its supplemental letter dated March 4, 2010, the licensee has provided its analysis of the issue of no significant hazards consideration which is presented below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The design basis events which impose initiation of the AFW System requirements are loss of normal main feedwater, main feed line or main steam line break, loss of offsite power, and small break loss of coolant accident. These design bases event evaluations assume actuation of the AFW System due to loss of offsite power signal, steam generator water level - low-low or a safety injection signal. The anticipatory motor driven AFW pump auto-start signals from the MFW pumps are not credited in any design basis accidents and are, therefore, not part of the primary success path for postulated accident mitigation as defined by 10 CFR 50.36(c)(2)(ii), Criterion 3. Modifying the Condition and Required Actions

for more than one inoperable channel for this function will not impact any previously evaluated design basis accidents.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response: No

The proposed changes to the TSs would allow two anticipatory motor driven AFW pump start channels to be placed in a tripped condition during the process of removing a MFW pump from service or placing a MFW pump in service. This change involves an anticipatory motor driven AFW pump auto-start function that is not credited in the accident analysis. The proposed change only affects the number of auto-start of motor driven AFW channels that may be inoperable while placing a MFW pump in service or removing a MFW pump from service in MODE 1. The proposed change does not affect the ESFAS functions that actuates AFW due to loss of offsite power, steam generator water level – low-low or a safety injection signal.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed changes to the TSs involves the automatic start of the AFW pumps due to trip of both MFW pumps which is not an assumed start signal for design basis events. This change does not modify any values or limits involved in a safety related function or accident analysis.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Kansas state official was notified of the proposed issuance of the amendment. The State official had no comments.

7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) the amendment does not: (a) involve a significant increase in the probability or consequences of an

accident previously evaluated; or, (b) create the possibility of a new or different kind of accident from any previously evaluated; or, (c) involve a significant reduction in a margin of safety and therefore, the amendment does not involve a significant hazards consideration; (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (3) such activities will be conducted in compliance with the Commission's regulations, and (4) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Stanley Gardocki
Kristy Bucholtz
Barry Marcus

Date: March 5, 2010

M. Sunseri

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determination and opportunity for a hearing, associated with the emergency circumstances, will be included in the Commission's next biweekly *Federal Register* notice.

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

Enclosures:

- 1. Amendment No. 187 to NPF-42
- 2. Safety Evaluation

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ADAMS Accession No. ML100630013

*Concurrence via e-mail

** Ravi Grover for Rob Elliott

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