

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Terry J. Garrett
Vice President Engineering

November 17, 2010

ET 10-0029

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

- Reference:
- 1) Letter ET 09-0007, dated March 4, 2009, from T. J. Garrett, WCNOG, to USNRC
 - 2) Letter dated January 29, 2010, from B. K. Singal, USNRC, to R. A. Muench, WCNOG, "Wolf Creek Generating Station - Request for Additional Information On License Amendment Request for Deviation from Fire Protection Program Requirements (TAC NO. ME0797)"
 - 3) Letter ET 10-0005, dated March 25, 2010, from T. J. Garrett, WCNOG, to USNRC

Subject: Docket No. 50-482: Changes to License Condition 2.C(5)

Gentlemen:

Reference 1 provided Wolf Creek Nuclear Operating Corporation's (WCNOG) License Amendment Request (LAR) to make changes to the approved fire protection program as described in the Wolf Creek Generating Station (WCGS) Updated Safety Analysis Report (USAR). Specifically, a deviation from certain technical requirements of 10 CFR 50, Appendix R, Section III.G.2, as documented in Appendix 9.5E of the WCGS USAR, was requested regarding the use of operator manual actions in lieu of meeting circuit separation protection criteria.

Reference 2 provided a Nuclear Regulatory Commission (NRC) request for additional information (RAI) related to the LAR to make changes to the approved fire protection program. Reference 3 provided WCNOG's response to the RAI.

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In discussions with the NRC Project Manager, it was identified that NRC approval of the change to the approved fire protection program as described in the WCGS USAR is required to be reflected in License Condition 2.C(5). The proposed deviation requested in Reference 1 is expected to be approved with the issuance of Amendment No. 191 to the Renewed Facility Operating License No. NPF-42. As such, WCNOG requests NRC issuance of License Condition 2.C(5) with the change proposed in the Attachment.

The requested change to License Condition 2.C(5) reflects the status of the approved fire protection program, does not expand the scope of the application as originally noticed, and does not impact the conclusions of the NRC staffs original proposed no significant hazards consideration determination as published in the Federal Register (75 FR 18258). In accordance with 10 CFR 50.91, a copy of this submittal is being provided to the designated Kansas State official.

This letter contains no additional 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

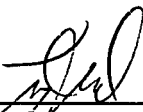
TJG/rt

Attachment

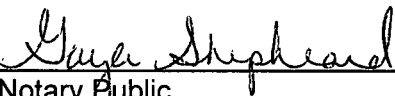
cc: E. E. Collins (NRC), w/a
T. A. Conley (KDHE), w/a
G. B. Miller (NRC), w/a
B. K. Singal (NRC), w/a
Senior Resident Inspector (NRC), w/a

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 17th day of November, 2010.


Notary Public



Expiration Date 7/24/2011

Changes to License Condition 2.C(5)

By letter dated March 4, 2009 (letter ET 09-0007), Wolf Creek Nuclear Operating Corporation (WCNOC) submitted a license amendment request (LAR) proposing changes to the approved fire protection program as described in the Wolf Creek Generating Station (WCGS) Updated Safety Analysis Report (USAR). The LAR proposed allowing the performance of operator manual actions, in certain cases, to achieve and maintain safe shutdown in the event of a fire outside of the control room in lieu of meeting the circuit separation protection requirements of 10 CFR 50, Appendix R, Section III.G.2 referenced in Appendix 9.5E of the USAR.

In discussions with the Nuclear Regulatory Commission (NRC) Project Manager, it was identified that NRC approval of the change to the approved fire protection program as described in the WCGS USAR is required to be reflected in License Condition 2.C(5). The proposed deviation requested in Reference 1 is expected to be approved with the issuance of Amendment No. 191 to the Renewed Facility Operating License No. NPF-42. Proposed changes to License Condition 2.C(5) are italicized and underlined.

(5) Fire Protection (Section 9.5.1, SER, Section 9.5.1.8, SSER #5)

- (a) The Operating Corporation shall maintain in effect all provisions of the approved fire protection program as described in the SNUPPs Final Safety Analysis Report for the facility through Revision 17, the Wolf Creek site addendum through Revision 15, and as approved in the SER through Supplement 5, and Amendment No. 191 subject to provisions b and c below.
- (b) The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
- (c) Deleted.