

WOLF CREEK NUCLEAR OPERATING CORPORATION

Russell A. Smith
Plant Manager

June 9, 2011

WO 11-0030

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

Reference: Letter WO 11-0025, dated May 12, 2011, from R. A. Smith, WCNOC, to USNRC

Subject: Docket No. 50-482: Cancellation of Licensee Event Report 2011-003-00, "Diesel Generator Declared Inoperable Due to Inadequate Reinstallation of Pipe Connection Resulting in Excessive Governor Oil Coolant Leak"

Gentlemen:

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the cancellation of Wolf Creek Generating Station (WCGS) Licensee Event Report (LER) 2011-003-00, "Diesel Generator Declared Inoperable Due to Inadequate Reinstallation of Pipe Connection Resulting in Excessive Governor Oil Coolant Leak." The cancellation of this LER is consistent with the guidance in NUREG-1022, Revision 2, "Event Reporting Guidelines 10 CFR 50.72 and 50.73," Sections 2.8 and 5.1.2.

The Reference reported an event under 50.73(a)(2)(i)(B) as a condition prohibited by technical specifications while Wolf Creek Nuclear Operating Corporation (WCNOC) further explored details associated to the use of a dedicated individual to fill the jacket water expansion tank during a loss of offsite power in determining past operability.

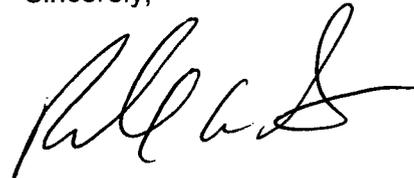
Regulatory Issue Summary (RIS) 2005-020, Rev. 1, "Revision to NRC Inspection Manual Part 9900 Technical Guidance, "Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety,"" Section 7.3, includes guidance on compensatory measures when evaluating degraded or nonconforming conditions. This section of the RIS further refers to Appendix C.5 for guidance on temporary use of manual actions instead of automatic actions to support operability determinations. Appendix C.5 contains guidance on use of a dedicated operator that includes written procedures and training on those procedures prior to use, in support of operability determinations.

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The guidance in NUREG-1022, Rev. 2, Section 3.2.7, states, in part: "A system must operate long enough to complete its intended safety function as defined in the safety analysis report. Generic Letter 91-18 provides guidance on determining whether a system is operable." RIS 2005-020, Revision 1, replaced Generic Letter 91-18. For the event described in the Reference, alarm response procedure ALR 501, "Standby Diesel Engine System Panel KJ-121," provides guidance for manual makeup to the expansion tank using essential service water in the event of a loss of offsite power. This procedure provides a dedicated individual to perform relatively simple actions for makeup to the expansion tank. Training on the alarm response procedure was provided to non-licensed operators during requalification cycle 11-01 that began in November 2010. Based on further review of the available information, WCNOG has subsequently concluded that the diesel generator would have been capable of performing its specified safety function with the reliance on a dedicated individual to provide makeup water to the expansion tank if a leak had occurred in conjunction with a loss of offsite power. Therefore, the diesel generator remained operable (except when taken out of service for planned maintenance or as required by technical specifications) and this event does not meet the criterion for reporting under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the plant's technical specifications.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4156, or Mr. Gautam Sen at (620) 364-4175.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell A. Smith", written in a cursive style.

Russell A. Smith

RAS/rlt

cc: E. E. Collins (NRC)
J. R. Hall (NRC)
G. B. Miller (NRC)
Senior Resident Inspector (NRC)