

# WOLF CREEK NUCLEAR OPERATING CORPORATION

Gautam Sen  
Manager Regulatory Affairs

April 18, 2012  
RA 12-0050

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

- Reference: 1. Letter WM 12-0008, dated April 2, 2012, from M. W. Sunseri, WCNOC, to USNRC, "Wolf Creek Nuclear Operating Corporation's Answer to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)"
2. Letter WM 12-0009, dated April 2, 2012, from M. W. Sunseri, WCNOC, to USNRC, "Wolf Creek Nuclear Operating Corporation's Answer to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)"

Subject: Docket No. 50-482: Correction of Administrative Errors in Two Letters Dated April 2, 2012, submitted by Wolf Creek Nuclear Operating Corporation

Gentlemen:

On April 2, 2012, Wolf Creek Nuclear Operating Corporation (WCNOC) submitted responses to two Nuclear Regulatory Commission Orders, Order Number EA-12-049 and Order Number EA-12-051, References 1 and 2, respectively. Following transmittal of the letters, WCNOC discovered an administrative error associated with page 1 of both letters. After completion of the required signatures, but prior to sending the letters, an administrative process inadvertently replaced page 1 of each letter with a version that contained formatting inconsistencies and other inconsistencies compared to page 1 of the letters that were signed.

Enclosed are corrected copies of the letters described in References 1 and 2 in the form that existed when the letters were originally signed. The corrections contained in the enclosures are administrative in nature and do not materially impact the content of References 1 and 2. WCNOC apologizes for any inconvenience associated with this correction.

AISI  
NRK

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

Sincerely,



Gautam Sen

GS/rit

- Enclosures:
1. Corrected Copy of Letter WM 12-0008, dated April 2, 2012, from M. W. Sunseri, WCNOG, to USNRC, "Wolf Creek Nuclear Operating Corporation's Answer to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)"
  2. Corrected Copy of Letter WM 12-0009, dated April 2, 2012, from M. W. Sunseri, WCNOG, to USNRC, "Wolf Creek Nuclear Operating Corporation's Answer to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)"

cc: E. E. Collins (NRC), w/e  
J. R. Hall (NRC), w/e  
N. F. O'Keefe (NRC), w/e  
Senior Resident Inspector (NRC), w/e

Enclosure 1 to RA 12-0050

Corrected Copy of Letter WM 12-0008, dated April 2, 2012, from M. W. Sunseri, WCNOC, to USNRC, "Wolf Creek Nuclear Operating Corporation's Answer to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)"

# WOLF CREEK NUCLEAR OPERATING CORPORATION

Matthew W. Sunseri  
President and Chief Executive Officer

April 2, 2012  
WM 12-0008

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

**Reference:** Letter dated March 12, 2012 from E. J. Leeds and M. R. Johnson, USNRC, to M. W. Sunseri, WCNOOC, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events"

**Subject:** Docket No. 50-482: Wolf Creek Nuclear Operating Corporation's Answer to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective order in the captioned matter entitled Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Effective Immediately) ("Order") to, *inter alia*, Wolf Creek Nuclear Operating Corporation (WCNOOC). The Orders state that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC had decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically, with respect to this Order, the NRC is requiring additional defense-in-depth measures at licensed nuclear power reactors to address uncertainties associated with protection from beyond-design-basis external events. Licensees are specifically directed by the Order to develop, implement, and maintain guidance and strategies to restore or maintain core cooling, containment, and spent fuel pool cooling in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2 will be achieved to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this Order in August 2012. Finally, the Order requires full

implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

Pursuant to 10 C.F.R. § 2.202 and the terms specified in the Order, WCNOG hereby submits its answer to the Order. WCNOG consents to the Order and does not request a hearing. Based on information currently available, WCNOG has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, WCNOG has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the integrated plan, or December 31, 2016, whichever is earlier. WCNOG will provide further responses as required by Section IV.C. in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of WCNOG to comply with the specific compliance deadline dates based on the probable availability of that guidance, WCNOG's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4008, or Mr. Gautam Sen at (620) 364-4175.

Sincerely,



Matthew W. Sunseri

MWS/rit

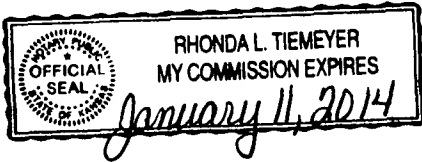
cc: E. E. Collins (NRC)  
J. R. Hall (NRC)  
E. J. Leeds (NRC)  
N. F. O'Keefe (NRC)  
Senior Resident Inspector (NRC)

STATE OF KANSAS    )  
                                  ) SS  
COUNTY OF COFFEY )

Matthew W. Sunseri, of lawful age, being first duly sworn upon oath says that he is President and Chief Executive Officer 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     *M W Sunseri*      
Matthew W. Sunseri  
President and Chief Executive Officer

SUBSCRIBED and sworn to before me this     *2<sup>nd</sup>*     day of     *April*    , 2012.



    *Rhonda L. Tiemeyer*      
Notary Public

Expiration Date     *January 11, 2014*

Enclosure 2 to RA 12-0050

Corrected Copy of Letter WM 12-0009, dated April 2, 2012, from M. W. Sunseri, WCNOG, to USNRC, "Wolf Creek Nuclear Operating Corporation's Answer to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)"

# **WOLF CREEK**

NUCLEAR OPERATING CORPORATION

Matthew W. Sunseri  
President and Chief Executive Officer

April 2, 2012  
WM 12-0009

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

Reference: Letter dated March 12, 2012 from E. J. Leeds and M. R. Johnson, USNRC, to M. W. Sunseri, WCNOG, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"

Subject: Docket No. 50-482: Wolf Creek Nuclear Operating Corporation's Answer to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

Gentlemen:

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The Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2 will be achieved to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this order in August 2012. Finally, the Order requires full



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Sincerely,



Matthew W. Sunseri

MWS/rit

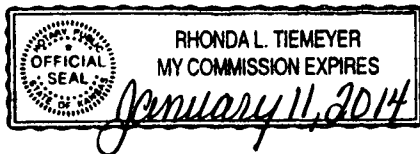
cc: E. E. Collins (NRC)  
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Senior Resident Inspector (NRC)

STATE OF KANSAS     )  
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COUNTY OF COFFEY )

Matthew W. Sunseri, of lawful age, being first duly sworn upon oath says that he is President and Chief Executive Officer 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 Matthew W. Sunseri  
Matthew W. Sunseri  
President and Chief Executive Officer

SUBSCRIBED and sworn to before me this 2<sup>nd</sup> day of April, 2012.



Rhonda L. Tiemeyer  
Notary Public

Expiration Date January 11, 2014