

# WOLF CREEK NUCLEAR OPERATING CORPORATION

Matthew W. Sunseri  
President and Chief Executive Officer

August 2, 2012  
WM 12-0023

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Reference: Letter dated July 5, 2012, from D. A. Powers, USNRC, to  
M. W. Sunseri, WCNOG

Subject: Docket No. 50-482: Reply to Notice of Violation EA-12-135

Gentlemen:

In accordance with 10 CFR 2.201, Attachment I provides Wolf Creek Nuclear Operating Corporation's (WCNOG) reply to Notice of Violation (NOV) EA-12-135 as contained in the reference and described in Inspection Report 05000482/2012007. Attachment II lists five regulatory commitments made in response to NOV EA-12-135.

If you have any questions concerning this matter, please contact me at (620) 364-4008, or Mr. Gautam Sen, Manager Regulatory Affairs, at (620) 364-4175.

Sincerely,



Matthew W. Sunseri

MWS/rit

Attachment I – Reply to Notice of Violation EA-12-135  
Attachment II – List of Regulatory Commitments

cc: T. A. Beltz (NRC) w/a  
E. E. Collins (NRC), w/a  
N. F. O'Keefe (NRC), w/a  
Senior Resident Inspector (NRC), w/a

*IEDI  
NRR*

**Reply to Notice of Violation (NOV) EA-12-135**

**Descriptions of Violations Identified in NOV EA-12-135**

1. Title 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that in the case of significant conditions adverse to quality, measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, from December 4, 2009, to May 24, 2012, the licensee failed to assure that the cause of a significant condition adverse to quality was determined and corrective action was taken to preclude repetition. Specifically, after a water hammer event on August 19, 2009, the licensee failed to perform an adequate evaluation to determine the cause of water hammers and of internal corrosion in the essential service water system, and did not take corrective action to preclude repetition of additional water hammer events and system leaks. The condition recurred on January 13, 2012. This violation was identified on two occasions by the NRC as NCV 05000482/2009007-03 and VIO 05000482/2012007-03; the licensee failed to restore compliance.

2. Title 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, as of May 24, 2012, the licensee had failed to establish measures to assure that a condition adverse to quality was promptly corrected. Specifically, after identifying that safety-related spring-loaded tornado dampers required testing to verify operability, the licensee failed to implement procedures to test these dampers in the emergency diesel generator and essential service water rooms. This violation was previously identified by the NRC as NCV 05000482/2010007-02; the licensee failed to restore compliance.

**Reason for the Violations**

Wolf Creek Nuclear Operating Corporation (WCNOC) management did not effectively develop, oversee or implement priorities and tracking tools to ensure that corrective actions related to regulatory issues are implemented in a timely manner. Additionally, the monitoring of actions that address regulatory issues by WCNOC's Licensing organization has been insufficient. Licensing initially tracks regulatory issues but has not tracked actions to completion after regulatory issues are entered in the Corrective Action Program.

### **Corrective Steps That Have Been Taken and Results Achieved**

#### **Violation 1: Failure to preclude repetition of ESW water hammer events and ESW leaks**

An inspection program for Essential Service Water (ESW) piping has been implemented through procedure AP 23L-001, "Lake Water Systems Corrosion and Fouling Mitigation Program." Inspection requirements, monitoring requirements, specifications for corrosion rates and methods for determining acceptance criteria have been added to procedure AI 23L-005, "Lake Water Piping Integrity," to support prevention of leaks from aboveground and underground ESW piping. Inspections of ESW piping have been performed, repairs have been made as needed and the inspection program continues to monitor for nonconformances.

#### **Violation 2: Failure to implement procedures to test tornado dampers**

Testing instructions for the safety-related, spring-loaded tornado dampers have been implemented. Two safety-related and spring-loaded tornado dampers, GD-D-0010 in the "B" train ESW pump house and GM-D-0009 in the "B" Emergency Diesel Generator (EDG) room, have been tested.

### **Corrective Steps That Will Be Taken to Avoid Future Violations**

#### **Violation 1: Failure to preclude repetition of ESW water hammer events and ESW leaks**

**Action 1-1:** WCNOC will revise a controlling procedure to require that Licensing conduct a meeting periodically to review the status of the regulatory issues priority list with Engineering, Operations, Maintenance and other divisions as needed. This action also applies to Violation 2. Due date: 09/06/2012

**Action 1-2:** WCNOC will prepare a documented schedule for completion of corrective actions to mitigate adverse effects of column closure water hammer in the ESW system to within acceptable design parameters. Due date: 10/01/2012

**Action 1-3:** WCNOC will add corrosion coupon test locations to the supply and return lines for both ESW trains at the aboveground to belowground interface in the 1974' elevation of the Control Building. Due date: 12/15/2012

**Action 1-4:** WCNOC will mitigate adverse effects of column closure water hammer in the ESW system to within acceptable design parameters. Due date: 04/02/2014

Violation 2: Failure to implement procedures to test tornado dampers

**Action 2-1:** WCNOC will test the "A" train EDG and ESW tornado dampers, GD-D-0003 in the "A" train ESW pump house and GM-D-0004 in the "A" EDG room. Due date: 09/03/2012

**Date When Full Compliance Will Be Achieved**

Violation 1: Failure to preclude repetition of ESW water hammer events and ESW leaks

Full compliance will be achieved by April 2, 2014.

Violation 2: Failure to implement procedures to test tornado dampers

Full compliance will be achieved by September 3, 2012.

### LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Gautam Sen at (620) 364-4175.

REGULATORY COMMITMENT	DUE DATE
WCNOC will test the "A" train EDG and ESW tornado dampers, GD-D-0003 in the "A" train ESW pump house and GM-D-0004 in the "A" EDG room.	September 3, 2012
WCNOC will revise a controlling procedure to require that Licensing conduct a meeting periodically to review the status of the regulatory issues priority list with Engineering, Operations, Maintenance and other divisions as needed.	September 6, 2012
WCNOC will prepare a documented schedule for completion of corrective actions to mitigate adverse effects of column closure water hammer in the ESW system to within acceptable design parameters.	October 1, 2012
WCNOC will add corrosion coupon test locations to the supply and return lines for both ESW trains at the aboveground to belowground interface in the 1974' elevation of the Control Building.	December 15, 2012
WCNOC will mitigate adverse effects of column closure water hammer in the ESW system to within acceptable design parameters.	April 2, 2014