

# **WOLF CREEK** NUCLEAR OPERATING CORPORATION

John P. Broschak  
Vice President Engineering

October 29, 2012

ET 12-0029

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

- References:
- 1) Letter dated March 12, 2012, from E. J. Leeds and M. R. Johnson, USNRC, to M. W. Sunseri, WCNO, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events"
  - 2) NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, August 29, 2012 (ADAMS Accession Number ML12229A174)
  - 3) Letter dated February 24, 2012, from A. R. Pietrangelo, Nuclear Energy Institute (NEI) to USNRC, "Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX)" (ADAMS Accession No. ML12061A023)
  - 4) NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, August 2012 (ADAMS Accession No. ML12242A378)

Subject: Docket No. 50-482: Wolf Creek Nuclear Operating Corporation Initial Status Report in Response 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 issued an order (Reference 1) to Wolf Creek Nuclear Operating Corporation (WCNO). Reference 1 was immediately effective and directs WCNO to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV,

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Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms WCNOG has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 to Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3);
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12 06, Revision 0 (Reference 4);
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.

Project milestones schedule through completion of installation and testing:

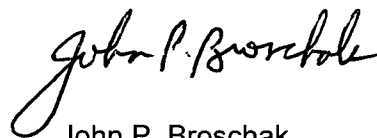
- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Wolf Creek Generating Station prior to startup from Refueling Outage 20, which is scheduled to begin in January 2015.

Technical difficulties encountered that could affect the ability to provide WCNOG's February 28, 2013, submittal:

- None at this time.

This letter contains no new commitments. If you have any questions concerning this matter, please contact me at (620) 364-4085, or Mr. Gautam Sen at (620) 364-4175.

Sincerely,



John P. Broschak

JPB/rlt

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

STATE OF KANSAS     )  
                                  ) SS  
COUNTY OF COFFEY    )

John P. Broschak, 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 *John P. Broschak*  
John P. Broschak  
Vice President Engineering

SUBSCRIBED and sworn to before me this 29<sup>th</sup> day of October, 2012.



*Gayle Shephard*  
Notary Public

Expiration Date 7/24/2015