

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

October 15, 2012

John P. Broschak  
Vice President Engineering

ET 12-0025

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

- Reference:
- 1) Letter WO 12-0035, dated May 2, 2012, from S. E. Hedges, WCNOC, to USNRC
  - 2) Letter dated September 17, 2012, from B. J. Benney, USNRC, to M. W. Sunseri, WCNOC, "Wolf Creek Generating Station – Request for Additional Information Regarding License Amendment Request to Revise Technical Specification 3.6.6, "Containment Spray and Cooling Systems" (TAC NO. ME8676)"

Subject: Docket No. 50-482: Response to Request for Additional Information Regarding License Amendment Request to Revise Technical Specification (TS) 3.6.6, "Containment Spray and Cooling Systems"

Gentlemen:

Reference 1 provided Wolf Creek Nuclear Operating Corporation's (WCNOC) application to revise Technical Specifications (TS) 3.6.6, "Containment Spray and Cooling Systems," to replace the ten-year surveillance Frequency for testing the containment spray nozzles in accordance with Surveillance Requirement 3.6.6.8 with an event-based Frequency. Reference 2 provided a request for additional information related to the application. Attachment I provides WCNOC's response to the questions contained in the request for additional information.

The additional information does not expand the scope of the application as originally noticed, and does not impact the conclusions of the Nuclear Regulatory Commission (NRC) staff's originally proposed no significant hazards consideration determination as published in the Federal Register (77 FR 53931).

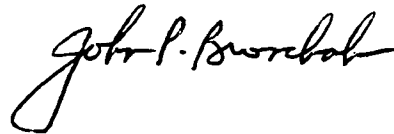
In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," a copy of this submittal is being provided to the designated Kansas State official.

*ADD  
NRC*

*designate as  
original  
Jenni Rankin 11-19-12*

This letter contains no 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,

A handwritten signature in black ink, appearing to read "John P. Broschak". The signature is written in a cursive style with a large, looping initial "J".

John P. Broschak

JPB/rit

Attachment

cc: B. J. Benney (NRC), w/a  
E. E. Collins (NRC), w/a  
T. A. Conley (KDHE), w/a  
N. F. O'Keefe (NRC), w/a  
Senior Resident Inspector (NRC), w/a

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 15<sup>th</sup> day of October, 2012.

Gayle Shephard  
Notary Public



Expiration Date 7/24/2015

**Response to Request for Additional Information Regarding  
License Amendment Request to Revise Technical Specification 3.6.6**

Reference 1 provided Wolf Creek Nuclear Operating Corporation's (WCNOC) application to revise Technical Specifications (TS) 3.6.6, "Containment Spray and Cooling Systems," to replace the ten-year surveillance Frequency for testing the containment spray nozzles in accordance with Surveillance Requirement (SR) 3.6.6.8 with an event-based Frequency. Reference 2 provided a request for additional information related to the application. The specific Nuclear Regulatory Commission (NRC) question is provided in italics.

1. *In Section 3.0 "Technical Evaluation," the third paragraph under the heading "Foreign Material Exclusion" states, in part, that*

*Due to their locations in the containment, introduction of foreign material into the spray headers is highly unlikely.*

*Please explain why it is unlikely that the location of the containment spray header would not cause introduction of foreign material into the spray system.*

**Response:**

The containment spray ring headers and nozzles are located on the domed roof of the containment building. The minimum elevation of the nozzles is 2165'-8", while the polar crane rails are located below an elevation of 2124'-5", and the top of the refueling cavity is located at an elevation of 2047'-0". Thus, the nozzles are a minimum of 40 feet above the polar crane rails and 115 feet above the top of the refueling cavity. The nozzles are located above all equipment in containment except for the polar crane maintenance truss and containment lighting. Foreign material would have to be carried vertically upward from a work area to the containment dome and into a nozzle in order to be introduced into the spray system. Therefore, the introduction of foreign material into the spray headers is highly unlikely. The most likely cause of spray header and nozzle blockage is the introduction of foreign material following maintenance involving opening portions of the system downstream of the containment isolation valves, as discussed in Section 3.0, "Technical Evaluation."

2. *Please describe the training and/or pre-job briefs received by personnel in order to be qualified to work on open systems, structures, and components such as the containment spray system.*

**Response:**

Procedure AP 30A-005, Revision 13, "Training and Qualification," establishes the requirements and expectations for training and qualification of personnel to perform activities affecting the operation and maintenance of WCGS. Personnel must be trained and qualified to perform work on controlled systems, structures, and components (SSC). The indoctrination and training of personnel performing activities affecting quality is required by 10 CFR 50, Appendix B and is implemented through an Institute of Nuclear Power Operation (INPO) accredited training program. The training and qualification is performed in accordance with an Institute of Nuclear Power Operation (INPO) accredited training program. Procedure AP 12-003, Revision 10,

"Foreign Material Exclusion," requires that personnel performing operating, maintenance or inspection activities on open systems or within a foreign material exclusion (FME) area shall be trained to implement the requirements of procedure AP 12-003 or continuously be supervised by someone trained to implement the requirements of procedure AP 12-003. The objectives of the foreign material exclusion training includes responsibilities for establishing FME controls, levels of FME controls, conditions that constitute loss of FME integrity and actions to take upon loss of FME integrity.

Procedure AP 22-001, Revision 13, "Conduct of Pre-job and Post-Job Briefs," provides guidance for the preparation and conduct of pre-job and post-job briefs to help ensure activities are performed in a safe and efficient manner. Additionally, procedure AP 12-003 provides guidance for performing FME pre-job briefs. FME pre-job briefs require a discussion and understanding of the FME controls and requirements prior to performing the work activity.

3. *Please confirm that the foreign material exclusion procedure requires an inspection to be performed when closing a system, structure, or component in order to ensure that all foreign material is removed.*

**Response:**

Procedure AP 12-003, Revision 10, "Foreign Material Exclusion," Section 6.11 prescribes the requirements for FME pre-closure inspection and closeout. Step 6.11.1 specifies that FME pre-closure inspections are required for all FME areas. Step 6.11.2 requires the verification during final system closure that there is no foreign material present in the system or component. This section of the procedure provides additional details in regard to FME log reconciliation, post-inspection of tools, removal of internal devices if used, and Quality Control verification immediately prior to final closure that no foreign material is in ASME Class 1 and 2 systems and components.

**References:**

1. Letter WO 12-0035 from S. E. Hedges, WCNOG, to USNRC, "Application to Revise Technical Specification 3.6.6, "Containment Spray and Cooling Systems," May 2, 2012.
2. Letter from B. J. Benney, USNRC, to M. W. Sunseri, WCNOG, "Wolf Creek Generating Station – Request for Additional Information Regarding License Amendment Request to Revise Technical Specification 3.6.6, "Containment Spray and Cooling Systems" (TAC NO. ME8676)," September 17, 2012.