



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

January 15, 2013

Matthew W. Sunseri, President and
Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KS 66839

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION FOR WOLF CREEK NUCLEAR
OPERATING CORPORATION [TAC NO. MF0480, NOED NO. 13-4-001]

Dear Mr. Sunseri:

By letter dated January 11, 2013, Wolf Creek Nuclear Operating Corporation (WCNOC), requested that the NRC exercise discretion to not enforce compliance with the actions required in Wolf Creek's Technical Specification 3.8.1, "AC Sources - Operating," Required Action B.4.1. Your letter documented information previously discussed between Mr. Russell Smith and other members of your staff, and the NRC in a telephone conference on January 10, 2013 at 1:00 p.m. (all times discussed in this letter refer to Central Standard Time). The principal NRC staff members who participated in the telephone conference included Barry Westreich, Acting Director, Division of Reactor Projects, Region IV (RIV); Jeff Clark, Acting Deputy Director, Division of Reactor Safety, RIV; Louise Lund, Deputy Director, Division of Operating Reactor Licensing, Office of Nuclear Reactor Regulation (NRR); Neil O'Keefe, Chief, Project Branch B, RIV; Michael Markley, Chief, Plant Licensing Branch 4, NRR; Anthony McMurtray, Chief, Component Performance and Testing Branch, NRR; Sheldon Stuchell, Notice of Enforcement Discretion (NOED) Process Coordinator, NRR; Matthew McConnell, Electrical Engineering Branch, NRR; Gerald Waig, Technical Specification Branch, NRR; David Loveless, Senior Reactor Analyst, RIV; Fred Lyon, Project Manager, NRR; Chris Long, Senior Resident Inspector, RIV; Charles Peabody, Resident Inspector, RIV; and See-Meng Wong, Senior Reactor Analyst, NRR.

On January 8, 2013, at 5:00 a.m., emergency diesel generator (EDG) B was removed from service for planned maintenance. On January 9, 2013, at approximately 12:13 p.m., during the removal of the rocker arm assembly on the number 7 cylinder, maintenance personnel contacted one of the eight cylinder head studs and identified that the head stud was broken. The stud was sent to an independent laboratory, and it was determined that the failure of the stud was due to cyclic fatigue. Beachmarks were identified on the fracture surface, which are indicative of fatigue. A possible contributing cause may have been fretting corrosion identified on the outer diameter of the stud directly adjacent the fracture initiation site. Fretting would cause a stress concentration on the outside diameter surface and make the material more susceptible to fatigue.

You stated that Technical Specification 3.8.1 Action B.4.1 was entered at 5:00 a.m. on January 8, 2013, in order to perform planned maintenance on EDG B. Technical Specification 3.8.1 Action B.4.1, requires restoring an inoperable EDG to operable status within 72 hours, or else place the plant in Mode 3 within 6 hours and Mode 5 within 36 hours per Required Actions H.1 and H.2, respectively. Enforcement discretion was sought to permit additional time to complete repairs and restoration of EDG B before a plant shutdown was required. An additional 96 hours was requested to restore EDG B such that the completion time of Required Action B.4.1 would expire at 5:00 a.m. on January 15, 2013. This letter documents the telephone conversation on January 10, 2013, at 1:00 p.m. between the WCNOG and NRC staff, when the NRC staff orally issued this NOED. We understand that the condition causing the need for this NOED was corrected by WCNOG, allowing WCNOG to exit Technical Specification 3.8.1 Action B.4.1 and this NOED at 10:54 p.m. on January 12, 2013.

In your letter, you indicated that the broken stud was original equipment that had been in service for approximately 30 years, and the engine has been run for 2321 hours during that time. Nondestructive testing involving ping tests (to identify broken studs) and ultrasonic testing (to identify any internally cracked studs) was completed on all remaining studs in EDG B prior to the NOED request being made, with no additional broken or cracked studs being identified.

WCNOG determined that repairs and post maintenance testing of EDG B were estimated to take approximately 130 hours (from identification of the broken stud to the EDG being declared operable). The repairs include draining the crankcase oil, removing the cylinder head, removing all eight studs, non-destructive examination of seven studs, replacing the broken stud and installing new studs adjacent to the broken stud, reinstalling the remaining five of the removed studs, assembly of the cylinder head, refilling the EDG crankcase with oil and performing post maintenance testing.

Your letter stated that this NOED was needed to avoid the unnecessary transient on the plant associated with a technical specification required shutdown, consistent with Part 9900: Technical Guidance, "Operations-Notices of Enforcement Discretion," Section B.2.1.1.a. WCNOG proposed to implement compensatory risk management measures during the proposed period of enforcement discretion that included: avoiding testing and maintenance and controlling access for the unaffected train; restricting access to the switchyard and elective or discretionary work that could challenge offsite power availability; ensuring that the ten 2 megawatt diesel generators at Sharpe Station were verified to be available and tested, with dedicated operators assigned who had reviewed the applicable operating procedures; contacting the grid operators to ensure continual monitoring of grid stability; and conducting briefings and training for operators on aligning Sharpe Station to provide power to Wolf Creek Generating Station. You stated that no severe weather was forecast which could challenge offsite power availability during the proposed period of enforcement discretion. WCNOG's risk assessment, including consideration of compensatory measures, showed that there would be no net increase in radiological risk due to the proposed extension of the technical specification required action time.

Your letter further stated that the proposed change did not involve a significant hazard based on the three standards set forth in 10 CFR 50.92(c), and did not involve adverse consequences to the environment such that the proposed change meets the categorical exclusion set forth in 10 CFR 51.22(c)(9). The Wolf Creek Generating Station Plant Safety Review Committee approved the NOED request on January 10, 2013, prior to the verbal request for an NOED. Because the request was a one-time extension of the required completion time for Technical Specification

3.8.1, Required Action B.4.1, you stated that a follow-up license amendment request was not required.

Based on the NRC staff's evaluation of WCNOC's request, the staff has concluded that granting this NOED is consistent with the NRC's Enforcement Policy and staff guidance and would have no adverse impact on public health and safety. Therefore, as communicated to your staff at 2:30 p.m. on January 10, 2013, the NRC exercised discretion to not enforce compliance with Technical Specification 3.8.1, Required Action B.4.1, for an additional period of 96 hours, to expire at 5:00 a.m. on January 15, 2013.

In addition, as discussed on January 10, 2013, the NRC staff agreed with your determination that a follow-up Technical Specification amendment is not needed. The staff concluded that an amendment (either a temporary or permanent amendment) is not necessary because this NOED involves a nonrecurring noncompliance and only involves a single request for extending the period of time for Technical Specification 3.8.1, Required Action B.4.1 to restore the Emergency Diesel Generator 'B' to an operable status.

As stated in the Enforcement Policy, action will be taken, to the extent that violations were involved, for the root cause that led to the noncompliance for which this NOED was necessary.

Sincerely,

/RA/

Barry C. Westreich, Deputy Director
Division of Reactor Projects

Docket: 50-482
License: NPF-42

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R:_REACTORS_WC\WC NOED 13-4-001.DOCX

ADAMS: <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes		<input checked="" type="checkbox"/> SUNSI Review Complete	Reviewer Initials: NFO
		<input checked="" type="checkbox"/> Publicly Available	<input checked="" type="checkbox"/> Non-Sensitive
		<input type="checkbox"/> Non-publicly Available	<input type="checkbox"/> Sensitive
C:RIV/DRP/B	SRA:RIV/DRS	PM:NRR/DORL/LPL4	D:RIV/ACES
NO'Keefe	DLoveless	FLyon	HGepford
/RA/	/RA/	/NA for signature/	/RA/
1/15/13	1/15/13	1/15/13	1/15/13
D:RIV/DRS	DD:NRR/DORL	D:RIV/DRP	
TBlount	LLund	BCWestreich	
/RA/	/RA-T CFO	/RA/	
1/15/13	1/15/13	1/15/13	

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