

WOLF CREEK NUCLEAR OPERATING CORPORATION

Matthew W. Sunseri
President and Chief Executive Officer

June 27, 2013

WM 13-0014

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

Reference: Teleconference on June 26, 2013, between M. W. Sunseri, WCNOC, and N. F. O'Keefe, USNRC

Subject: Docket No. 50-482: WCNOC Commitment to NRC Regarding Actions necessary to increase safety margins at Wolf Creek Generating Station through ongoing actions to resolve SCCIs.

Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOC) is voluntarily providing information supporting the closure of substantive cross-cutting issues (SCCIs) in the areas of H.2.c, "Documentation," and P.1.d, "Corrective Actions."

The commitments to complete the actions necessary to increase safety margins at Wolf Creek Generating Station and resolve the SCCIs in the areas of H.2.c and P.1.d are listed in the attachment to this letter. These commitments address the following areas and are described in the attachment with more detailed steps and completion dates:

Essential Service Water Piping Integrity
Preventive Maintenance
Operations & Maintenance Procedure Quality

A teleconference was held on June 26, 2013 between representatives of Wolf Creek Nuclear Operating Corporation and NRC Region IV's Branch B Chief to achieve understanding of the scope and timeline for these commitments. The "End of Mid-Cycle 20" stated on the attachment is defined as prior to closure of the main generator output breaker following the completion of that planned maintenance outage.

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NRK

If you have any questions concerning this matter, please contact me at (620) 364-4008, or Mr. Michael J. Westman at (620) 364-4009.

Sincerely,

A handwritten signature in black ink, appearing to read "M W Sunseri". The letters are cursive and connected.

Matthew W. Sunseri

MWS/rtt

Attachment: List of commitments

cc: A. T. Howell (NRC), w/a
C. F. Lyon (NRC), w/a
N. F. O'Keefe (NRC), w/a
Senior Resident Inspector (NRC), w/a

LIST OF COMMITMENTS

The following table identifies commitments and additional actions identified by Wolf Creek Nuclear Operating Corporation in this document. Any other statements in this letter are provided for information purposes and are not considered regulatory commitments. Please direct questions regarding these commitments to Mr. Michael Westman, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4009.

REGULATORY COMMITMENT	DUE DATE
<p><u>Essential Service Water Piping Integrity</u></p> <p>ESW Water Hammer: WCNOC will install the modification to mitigate water hammer during the Mid-Cycle Outage.</p> <p>ESW Below Ground: WCNOC will complete the below ground piping installation, tie-in and testing during the Mid-Cycle Outage.</p> <p>ESW Above Ground: WCNOC will replace a minimum of 1200 linear feet during the Mid-Cycle Outage.</p>	<p>End of Mid-Cycle 20 outage (est. April, 2014)</p>
<p><u>Additional Information</u></p> <p>The remaining affected above ground piping, prioritized based on risk significance, is planned to be replaced during the next five refueling outages.</p>	
<p><u>Preventive Maintenance</u></p> <p>Wolf Creek will verify completion of 40 percent (580 tasks) of the new preventive maintenance scope of high critical (FID-1) classified assets as a result of Phase 1 of the ongoing Preventive Maintenance Optimization project. FID-1 components are equipment whose failure would have a significant impact on level and continuity of risk, safety functions, production and compliance.</p>	<p>End of Mid-Cycle 20 outage (est. April, 2014)</p>
<p><u>Additional Information</u></p> <p>Greater than 95 percent of these FID-1 tasks are planned to be completed by the end of Refueling Outage 21.</p>	

<p><u>Operations Procedure Quality</u></p> <p>Wolf Creek will revise the General Operating Procedures (GENs) that direct operation of the plant from 100% power to cold shutdown and from cold shutdown back to 100% power. This includes a revision of over 50 percent of the GENs.</p> <p>Wolf Creek will develop a resource-loaded schedule to complete the remaining GENs, System Operating (SYS) procedures and Technical Specification Surveillance procedures (STSs).</p>	<p>End of Mid-Cycle 20 outage (est. April, 2014)</p>
<p><u>Additional Information</u></p> <p>Wolf Creek had an independent assessment performed by an industry expert that identified the GENs, SYSs and STSs as needing revision. This assessment indicated that other procedure types (EMGs, OFNs, and ALRs) were written to industry standards.</p> <p>The full scope of the effort is planned to be completed by year-end 2016.</p>	
<p><u>Maintenance Procedure Quality</u></p> <p>Wolf Creek will complete 40 percent (107 of 267) of the Maintenance craft performed Technical Specification surveillance procedures. These will be prioritized based on the importance and frequency of use so that the most commonly performed procedures are considered first.</p> <p>Wolf Creek will develop a resource-loaded schedule to complete the remaining significant Maintenance craft performed Technical Specification surveillance procedures, 469 craft performed non-Technical Specification surveillances, and approximately 500 important and frequently used craft performed procedures.</p>	<p>End of Mid-Cycle 20 outage (est. April, 2014)</p>
<p><u>Additional Information</u></p> <p>The full scope of this effort is planned to be completed by year-end 2016.</p>	