WOLF CREEK
NUCLEAR OPERATING CORPORATION

John P. Broschak
Vice President Engineering

October 22, 2013
ET 13-0036

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

Subject: Docket No. 50-482: Submittal of Information Related to the Request for Notice of Enforcement Discretion for Technical Specification Limiting Condition for Operation (LCO) 3.0.3, TS 3.8.4, "DC Sources – Operating," TS 3.8.7, "Inverters – Operating," and TS 3.8.9, "Distribution Systems – Operating"

Gentlemen:

This letter confirms the results of the teleconference that was conducted between Wolf Creek Nuclear Operating Corporation (WCNOC) and Nuclear Regulatory Commission (NRC) Staff representatives at 2000 hours Central Daylight Time (CDT) on October 18, 2013 in which WCNOC requested the NRC to exercise enforcement discretion for the Wolf Creek Generating Station (WCGS), regarding the requirements of Technical Specification (TS) Limiting Condition for Operation (LCO) 3.0.3, TS 3.8.4, "DC Sources – Operating," TS 3.8.7, "Inverters – Operating," and TS 3.8.9, "Distribution Systems – Operating." With the plant operating in MODE 3, the request was made in order to provide additional time to repair and test the 'A' Class 1E electrical equipment air conditioning (A/C) unit (SGK05A) before a shutdown from MODE 3 to MODE 5 would have otherwise been required.

The events leading to WCNOC's request began at 1050 hours on October 18, 2013, when the SGK05A was initially declared nonfunctional when it was observed that SGK05A was not in service due to a lube oil pressure failure indication. The SGK05A unit was restarted by maintenance personnel at 1100 and LCO 3.0.3 was exited. The unit again tripped on low lube oil pressure at 1141 with the same low oil pressure light illuminated. LCO 3.0.3 was re-entered and actions were initiated to prepare for a plant shutdown. Since one nonfunctional Class 1E electrical equipment A/C train renders the supported train of affected electrical equipment inoperable (i.e., two inverters among other affected equipment), LCO 3.0.3 was entered in light of the limitations of the Conditions and Required Actions of TS 3.8.7, "Inverters - Operating." LCO 3.0.3 requires action to be taken within 1 hour to place the plant in MODE 3 within 7 hours, in MODE 4 within 13 hours, and in MODE 5 within 37 hours. Therefore, absent a support system TS LCO to declare inoperable, the control room staff is required to enter LCO 3.0.3 anytime a Class 1E electrical equipment A/C train is discovered to be nonfunctional. At 1141 hours a plant shutdown was initiated in accordance with LCO 3.0.3. The plant entered MODE 3 at 1735 hours.

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Enforcement discretion was sought to permit noncompliance with LCO 3.0.3, TS 3.8.4, TS 3.8.7, and TS 3.8.9 to permit additional time to complete repairs and restoration of SGK05A before entry into MODE 4 and subsequently MODE 5 was required. An additional 72 hours was requested to restore SGK05A to FUNCTIONAL status such that the action to place the plant in MODE 4 within 13 hours per LCO 3.0.3b. and MODE 5 within 37 hours per LCO 3.0.3c. would begin at 1141 hours CDT on October 21, 2013. The incremental conditional core damage probability (ICCDP) and incremental conditional large early release probability (ICLERP) was quantified for the requested additional time for restoring SGK05A. The results of the quantification are within the guidance threshold in NRC Inspection Manual, Manual Chapter 0410, "Notices of Enforcement Discretion." WCNOC determined that there is no net increase in radiological risk.

At approximately 2310 hours on October 18, 2013, Mr. Kriss Kennedy, Director Division of Reactor Projects, Region IV, notified WCNOC that after NRC Region IV Office consideration of WCNOC's verbal request for enforcement discretion, and in consultation with the NRR technical staff, the request for a Notice of Enforcement Discretion (NOED) was denied due to the differences between the WCNOC risk assessment and the NRC risk assessment. WCNOC is submitting the information associated with the verbal request for the NOED within 2 working days of the request.

The Attachment provides the information documenting WCNOC's verbal request for the NOED. If you should have any questions regarding this submittal, please contact me at (620) 364-4085, or Mr. Michael J. Westman at (620) 364-4009.

Sincerely,

John P. Broschak

JPB/rlt

Attachment Request for Notice of Enforcement Discretion (NOED) Regarding Limiting Condition for Operation 3.0.3, Technical Specifications 3.8.4, 3.8.7, and 3.8.9

cc: C. F. Lyon (NRC), w/a
N. F. O'Keefe (NRC), w/a
S. A. Reynolds (NRC), w/a
Senior Resident Inspector (NRC), w/a

Request for Notice of Enforcement Discretion (NOED) Regarding Limiting Condition for Operation 3.0.3, Technical Specifications 3.8.4, 3.8.7, and 3.8.9

The below information is provided utilizing the guidance in NRC Inspection Manual, Manual Chapter 0410, "Notices of Enforcement Discretion."

a. The type of NOED being requested.

A regular NOED to avoid an unnecessary transient as a result of compliance with the Technical Specifications (TSs) is being requested since compliance with the TSs would involve an unnecessary shutdown of the plant from MODE 3 to MODE 5 without a corresponding health and safety benefit.

b. The Technical Specification (TS) or other license conditions that will be violated.

The Technical Specifications that would be violated for the plant to remain in MODE 3 are Limiting Condition for Operation (LCO) 3.0.3, Required Action B.2 of TS 3.8.4, Required Action B.2 of TS 3.8.7, and Required Action E.2 of TS 3.8.9.

LCO 3.0.3 requires, in part, action to be taken to place the plant in MODE 4 within 13 hours, and in MODE 5 within 37 hours. LCO 3.0.3 was entered in light of the limitations of the Conditions and Required Actions of TS 3.8.7, "Inverters - Operating." Therefore, absent a support system TS LCO to declare inoperable, the control room staff is required to enter LCO 3.0.3 anytime a Class 1E Electrical Equipment A/C train is discovered to be nonfunctional, resulting in an unnecessary plant transient.

Required Action B.2 of TS 3.8.4 requires placing the plant in MODE 5 in 36 hours if Required Action A.1 (restore DC electrical power subsystem to OPERABLE status) and its associated Completion Time (2 hours) is not met. Required Action B.2 of TS 3.8.7 requires placing the plant in MODE 5 in 36 hours if Required Action A.1 (restore one required inverter to OPERABLE status) and its associated Completion Time (24 hours) are not met. Required Action E.2 of TS 3.8.9 requires placing the plant in MODE 5 in 36 hours if Required Actions C.1 and D.1 (restore one AC vital bus subsystem and one DC electrical power distribution subsystem to OPERABLE status) and its associated Completion Time (2 hours) is not met.

c. The circumstances surrounding the situation: including likely causes; the need for prompt action; action taken in attempt to avoid the need for an NOED; and identification of any relevant historical events.

Likely causes: The likely cause of the SGK05A (Class 1E Electrical Equipment Air-Conditioning (A/C)) compressor trip is from a faulty pressure sensing switch. At no time was low lube oil pressure observed from visual gauges mounted at the unit.

An operator observed the SGK05A compressor had tripped on low oil pressure as indicated by a lube oil failure light on the unit control panel. LCO 3.0.3 was initially entered at 1050.

The SGK05A unit was restarted by maintenance personnel at 1100 and LCO 3.0.3 was exited. The unit again tripped on low lube oil pressure at 1141 with the same lube oil failure light illuminated. LCO 3.0.3 was re-entered and actions initiated to prepare for a plant shutdown.

A timeline of the events follows:

1050 Turbine building watch reported SGK05A compressor not running and the lube oil failure light is lit.

1100 SGK05A restarted by resetting the Oil Pressure Sensing System. Monitored for 10 minutes with normal oil pressure and level. Individual stationed at SGK05A to monitor operation.

1141 SGK05A shutdown again on low oil pressure as indicated by a lube oil failure light on the unit control panel. Declared SGK05A nonfunctional, entered LCO 3.0.3.

Need for prompt action: A plant shutdown was initiated in accordance with LCO 3.0.3. The request for the NOED is to eliminate an additional unnecessary transient of maneuvering the plant from MODE 3 to MODE 5.

Action taken in attempt to avoid the need for an NOED: A calculation had been developed that would allow one SGK05 train to cool both Class 1E electrical equipment trains. Results of calculation indicate that compensatory measures are needed to maintain equipment less than 104°F. WCNOC was in the process of installing the necessary equipment and safety related power that would allow the use of the compensatory measures. A permanent modification is planned for Refueling Outage 21 (fall 2016) to install redundant A/C units.

Last NOED Request: The last request for a NOED was on June 17, 2013 due to a failed compressor on SGK05A. A NOED was granted at 1607 hours on June 17, 2013, for 168 hours.

There are no outstanding amendments or license amendment requests related to this request for NOED.

Historical Events: During the week of May 23, 2012, a Nuclear Regulatory Commission (NRC) Problem Identification and Resolution team inspection identified several concerns with the incorporation of calculation GK-06-W, Revision 2, "SGK05A/B Class 1E Electrical Equipment Rooms A/C Units, Single Unit Operation Capability," into plant documents. One of the concerns related to the calculation requirements for the use of temporary ventilation fans and the fans not being powered from a safety related source.

On May 29, 2012, SGK05B was declared nonfunctional due to the oil pump pressure degrading. The SGK05B unit was restored to FUNCTIONAL status prior to completing a prompt OPERABILITY determination.

On June 4, 2012, the compressor for SGK05A was found tripped on low oil pressure and the unit declared nonfunctional. During the Operability Determination and Functionality Assessment process it was determined that OPERABILITY of the associated train Class 1E electrical equipment could not be maintained without additional compensatory measures and for a limited period of time. The functionality requirements imposed on the Class 1E electrical equipment AC trains at WCGS were governed by TRM TR 3.7.23, "Class 1E Electrical Equipment Air-Conditioning (A/C)". With one Class 1E electrical equipment A/C train nonfunctional when the plant is in MODES 1 through 4, TR 3.7.23 allowed up to a 7-day delay period before declaring the supported Class 1E electrical equipment inoperable (in the area served by the A/C train)

and entering the applicable Conditions and Required Actions of TS 3.8.4, TS 3.8.7, and TS 3.8.9.

The failure of a Class 1E electrical equipment A/C train currently results in declaring the affected Class 1E electrical equipment inoperable and entry into the Conditions and Required Actions of TS 3.8.4, TS 3.8.7 and TS 3.8.9 as well as entry into LCO 3.0.3. In addition, preventative maintenance activities that require taking the Class 1E electrical equipment trains out of service currently require entry into the Conditions/Required Actions of TS 3.8.4, TS 3.8.7 and TS 3.8.9 as well as entry into LCO 3.0.3. Note that voluntary entry into LCO 3.0.3 is prohibited.

On June 17, 2013, the analysis of an oil sample taken from SGK05A showed elevated levels of aluminum. This was discussed with the equipment manufacturer and it was concluded that the equipment could no longer be considered reliable to support the mission time of supported systems. This condition, in conjunction with other monitoring parameters, led to the conclusion that the unit could not be relied on to meet its required function and the Shift Manager declared the unit nonfunctional and entered LCO 3.0.3 at 1111 am. WCNOC requested a NOED to permit continued operation in MODE 1 that was subsequently approved.

On September 11, 2013, during Operator rounds, a low oil level on the SGK05A compressor, elevated vibration and a slight increase in motor current were observed. The compressor refrigeration parameters (suction pressure, discharge pressure, oil pressure, Thermostatic Expansion Valve (TXV) superheat) were running normal and the room temperatures were being maintained. After inspection by Electrical Maintenance and Engineering personnel, it was determined that the symptoms were similar to the June compressor failure. The SGK05A unit was declared nonfunctional at 1645 and LCO 3.0.3 was entered. A plant shutdown was conducted in accordance with LCO 3.0.3. During this shutdown, the pressure sensing switch in SGK05A was replaced. All other units have not had their pressure sensing switches replaced.

d. Information to show that the cause of the situation that led to the NOED request is fully understood.

At 1210, maintenance personnel assembled at the unit to begin troubleshooting under WO 13-379314-000.

First troubleshooting run:

> At 1253 the unit was restarted. Voltage was monitored across the oil switch terminals going into the low oil pressure control module. Additionally, the oil pressure was manually monitored at the unit with unit mounted visual pressure gauges. The oil pressure showed normal levels on the visual gauges. At 1255 the unit tripped back off, again on low oil pressure. This corresponds to a 2 minute low oil pressure delay built into the oil pressure monitor. An indicating light on the monitor control board remained red, indicating an oil pressure problem. Additionally the voltage (measure with a meter) across the switch did not change.

Second troubleshooting run:

At 1315, the unit was started a second time. This time the monitor control board light turned green, indicating a normal oil pressure, and the unit continued to run past 2 minutes. At 13 minutes 20 seconds into the run, the light on the oil pressure control board changed to red, and the meter indicated a voltage change. This lasted for about 5 seconds after which the voltage returned back to normal and the control board light turned green. During this time, the oil pressure read by the gauges remained steady. The compressor did not trip since the 2 minute timer had not timed out.

After 23 minutes into the run, maintenance personnel started to remove the cable/connector going into the oil pressure sensor. After moving the connector, a change in voltage occurred and the red control board light illuminated. The connector was pushed back and agitated in an attempt to regain electrical contact. The electrical connection could not be made and the unit tripped off on low oil pressure after the 2 minute low pressure timer expired. Again, the unit mounted gauges showed normal oil pressure during the entire run.

Third troubleshooting run:

For this run, the connector was completely disconnected from the sensor and a jumper installed to simulate a closed oil pressure switch. The oil pressure switch was monitored with an electrical meter. The switch performance did not respond as expected while it was running or shutdown. The compressor was allowed to run for 28 minutes with the oil pressure remaining normal as observed by the visual oil pressure gauges. When the unit was shut off, the switch did not change from closed to open. This proved the switch was bad since it did not change state as expected.

e. Information on the proposed course of action to resolve the situation, such that there is a high likelihood that planned actions can be completed within the proposed NOED time frame.

A timeline has been developed that will allow for the following activities to be performed within the time allowed by the requested NOED.

Prior to any work being performed preparations are being made to conduct the following compensatory actions:

- Put temporary cooling in place for the spaces normally cooled by SGK05A. This will be a temporary A/C unit (elephant trunk type) powered by reliable non-safety power. A second unit will be made available in case of failure.

- Monitoring of room temperature will be done every two hours and if room temperatures exceed limits the appropriate actions will be taken.

- A fire watch will be established to compensate for the fire barriers that will be breached by the temporary A/C units.

- No elective maintenance would be performed on other safety related equipment or in the switchyard that could challenge offsite power availability.

The work to be performed follows:

Hang clearance order.
Recover refrigerant from the system.
Replace sensor.
Replace filter in the inline filter-drier.
Add freon and perform evacuation.
Perform vacuum hold.
Remove clearance order.
Perform Post Maintenance Testing (PMT).

Estimates to complete this work have it completing within the 72 hours requested in the NOED.

f. Information to show that the resolution of the situation will not result in a different, unnecessary transient.

Repairs to the lube oil failure circuitry will not result in a different unnecessary transient as SGK05A is not the initiator of any event. Performing these repairs within the time allowed by the NOED will avoid an unnecessary plant transient.

g. Explain why there was not time to process an emergency license amendment, or that a license amendment is not needed.

Indications of a problem first occurred at 1050 when SGK05A tripped off with an alarm light indicating a lube oil pressure failure. The Shift Manager declared SGK05A nonfunctional with the resultant entry into LCO 3.0.3. The unit was restarted and LCO 3.0.3 was exited. The unit tripped off again at 1141 and was declared nonfunctional with the resultant re-entry into LCO 3.0.3. LCO 3.0.3 requires the plant be in MODE 3 in 7 hours, MODE 4 in 13 hours, and MODE 5 in 37 hours. Based on the time frame to be in MODE 4, there was insufficient time to pursue an emergency license amendment.

h. The condition and operational status of the plant (including safety related equipment out of service or otherwise inoperable).

The plant is in MODE 3 at the time of this request.

The following equipment is out of service:

- *One non-safety related service water pump out of service for refurbishment*
- *PZR safety valve indication – BB ZL-8010C*

i. The justification for the duration of the non-compliance.

This request is for 72 hours from entry into LCO 3.0.3 on October 18, 2013 at 1141. This request takes into account the time for the specific NOED request, a 24 hour duration to affect repairs and return SGK05A to service, and additional time for contingencies.

j. Detail and explain compensatory actions that have been taken and will be taken to reduce the risk associated with the specified configuration.

In order to reduce the risk during the duration of the NOED, the following compensatory actions are being established:

- Put temporary cooling in place for the spaces normally cooled by SGK05A. This will be a temporary A/C unit (elephant trunk type) powered by reliable non-safety power. A second unit will be made available in case of failure.
- Monitoring of room temperature will be done every two hours and if room temperatures exceed limits the appropriate actions will be taken.
- A fire watch will be established to compensate for the fire barriers that will be breached by the temporary A/C units.
- No elective maintenance would be performed on other safety related equipment or in the switchyard that could challenge offsite power availability.

k. The status and potential challenges to off-site and on-site power sources.

Currently the grid is stable with no planned switchyard or grid work that would impact grid reliability during the NOED period. Both on-site diesel generators are OPERABLE with no planned maintenance or surveillances scheduled.

The station blackout diesel generators are available.

l. The safety basis for the request, including an evaluation of the safety significance and potential consequences of the proposed course of action.

1. Risk Calculation

The Wolf Creek Generating Station (WCGS) Equipment Out Of Service (EOOS) zero test and maintenance Revision 7 Probabilistic Risk Assessment (PRA) model was used to establish the plant's baseline risk and the estimated risk increase associated with the period of enforcement discretion. Core Damage Frequency (CDF), Large Early Release Frequency (LERF), ICCDP, and ICLERP values are listed below and compared with guidance thresholds discussed above.

The At-Power model is acceptable for estimating risk in MODE 3. Staying in MODE 3 maintains the Initiating Event Frequencies as in MODE 1. The MODE 3 Reactor Coolant System (RCS) temperatures and pressures are closer to MODE 1 conditions than MODE 5. In addition, many more automatic actions remain active in MODE 3 as opposed to MODE 5.

The WCGS PRA Revision 7 model contains the following noteworthy changes:

- Added station blackout diesel generators to power either safety related Class IE electrical bus
- Removed low RCS leakage credit for the installed Westinghouse Reactor Coolant Pump (RCP) SHIELD Seal

Update of initiating event initiating event frequencies for:

- Transient without Power Conversion System (TRO)
- Interfacing System Loss of Coolant Accident (ISLOCA)
- Consequential events
  - Anticipated Transient without Scram (ATW-IE)
  - Consequential Pressurizer LOCA (PVI-IE)
  - Loss of RCP Seal Cooling (RCI-IE)
  - Station Blackout (SBO)
- Special initiating events
  - Loss of the Component Cooling Water System (INIT-CCW)
  - Loss of the Normal Service Water System (INIT-SWS)
  - Loss of a Vital DC Bus (INIT-DC1-NK01, INIT-DC1-NK51, INIT-DC4-NK04, or INIT DC4-NK54)

- Updates of the component failure data in the ISLOCA fault trees
- Reassignment of the very small LOCA event to the transient initiating event group
- Revision of the success criteria for some SBO sequences

Quantification of the plant risk for the initial plant condition has one of the two Class IE Electrical Equipment Air Conditioning units out of service. Additionally, the 'A' Normal Service Water pump (1WS001PA) is reflected as out of service as it is physically removed from the plant and has been shipped offsite for maintenance.

Numerical results of the cases for the risk evaluation are provided below in Table 1. The first is the Base Case and uses the Zero Test and Maintenance model. The second case represents the current plant condition with both the 1WS001PA and SGK05A out of service.

Table 1: EOOS Results

Equipment OOS	CDF (/ry)	LERF (/ry)
Base CDF zero T&M @ 1E-12 truncation	2.27E-06	2.68E-07
Base CDF zero T&M, 1WS001PA OOS & SGK05A Fail	8.81E-06	2.69E-07

The ICCDP and ICLERP were calculated from data in Table 1 using Equations 1 and 2 below.

Equation 1: ICCDP = (ΔCDF) x Duration in years
Equation 2: ICLERP = (ΔLERF) x Duration in years

The Duration in years is defined as the additional time for the SGK05A to be out of service. This request is for an additional 72 hours to complete repairs on the SGK05A unit.

ICCDP = (8.81E-6 – 2.27E-6) * (72 hrs ÷ 8760 hrs/yr) = 5.3E-08
ICLERP = (2.69E-7 – 2.68E-7) * (72 hrs ÷ 8760 hrs/yr) = 8.22E-12

The calculated value for ICCDP meets the NRC Inspection Manual, Manual Chapter 0410, "Notices of Enforcement Discretion," guidance threshold of less than or equal to 5.0E-07 ICCDP and 5E-08 ICLERP. The calculated ICCDP and ICLERP values reported above do not account

for various conservatisms in place such as the various compensatory actions being taken by operations and maintenance while under the NOED.

Numerical risk reductions for avoidance of Transition and Shutdown Risk are not included in the above results. WCNOC developed a Shutdown PRA in 1999. It utilized the same methodologies for fault tree development as the At-Power model. While it was not fully approved, insights from its use showed a notable risk increase transitioning in MODE 4 due to the defeat of automatic actuations for Safety Injection. This caused a higher reliance on the success of Operator Actions. By simple qualitative evaluation, the numerical insight was reasonable.

2. Dominant Risk Contributors

CDF is dominated by the Loss of 13.8 KV Bus PA001 Initiating Event, INIT-AC1, (44.9%). Other contributions include:

- Loss of Service Water, INIT-SW, (14.2%)
- Transient With Steam Conversion, INIT-TRA, (13.0%),
- Steam Generator Tube Rupture, INIT-SGR, (4.9%),
- Loss of 4KV Bus SL-31,INIT-AC31, (4.2%)
- Loss of 13.8KV Bus SL-3,INIT-AC3, (3.5%)
- Feedline Break, INIT-FLB, (2.6%),
- Loss of Main Feedwater, INIT-MFW, (2.5%)
- Loss of Condenser heat sink, INIT-COND, (2.1%)
- Interfacing System LOCA on Cold Leg Injection, INIT-ISL-EJ-CL1, (1.8%),
- Small LOCA, INIT-SLO, (1.4%),
- Large Steam Line Break Outside Containment, INIT-SLBO, (1.4%)
- Other (3.7%)

By similar inspection, LERF is dominated by INIT-ISL-EJ-CL1 and INIT-SGR (81.5%, combined). The only other significant contribution to LERF comes from INIT-ISL-RHR-SCT (12.4%).

3. Compensatory Risk Management Actions

Compensatory risk management actions taken by the plant are not explicitly credited in this evaluation. This is considered a source of conservatism. As an example of ongoing compensatory actions not being credited; temporary cooling is replacing the function of the out-of-service SGK05A unit, room temperatures are being monitored on a regular basis, and no elective maintenance would be performed on other safety related equipment or in the switchyard that could challenge offsite power availability.

4. Extent of Condition

An increase in the probability of the common cause failure terms for the SGK05A and SGK05B units is not considered to be appropriate. The SGK05B unit is not showing any indication similar to that of the "A" unit. Common cause basic events "ACGK-05AB--12-R1" (fail to run) and "ACGK-05AB--12-S1" (fail to start) retain their respective values.

5. External Events

A list of the current fire impairments was reviewed with Fire Protection personnel. All current fire impairments are mitigated by compensatory risk management actions. Nothing was identified that would impact this evaluation.

Weather forecast information for the 72 hours during which the NOED would be in effect was obtained from the National Weather Service website. There is no mention of severe weather for the duration. The specific weather forecast is provided under Section n.

Seismic Event

Seismic considerations are treated as follows. The seismically induced LOOP is taken from Risk Assessment of Operational Events Volume 2 – External Events Revision 1.01 - January 2008, Appendix A Frequencies of Seismically-Induced LOOP Events for SPAR Models:

- 3.29E-04 Seismic Initiating Event Frequency
- 5.70E-02 Conditional Loss of Offsite Power
- 1.87E-05 Seismic Induced Loss of Offsite Power

By simple inspection, the additional failures, such as those of Diesel Generators with fail-to-start basic event value of 2.89E-03 and the fraction of a year for the NOED (1.92E-02) results in any applicable sequence being well below 1E-07. Therefore, contribution to CDF from seismic is not considered significant.

m. Demonstrate that the NOED condition, along with any compensatory measures, will not result in more than a minimal increase in radiological risk

Continued operation of the plant during the period of enforcement discretion will not cause risk to exceed the level determined acceptable during normal work controls and therefore there is no net increase in radiological risk to the public. The risk metrics described by the NOED guidance are ICCDP less than or equal to 5.0E-07 and ICLERP less than or equal to 5.0E-08.

n. Discuss forecasted weather and pandemic conditions for the requested NOED period and any plant vulnerabilities related to weather or pandemic conditions.

Weather forecast information for the 72 hours during which the NOED is in effect was obtained from the National Weather Service website. There is no mention of severe weather for the duration. Below is the specific weather forecast for the requested duration:

NATIONAL WEATHER SERVICE TOPEKA KS
211 PM CDT FRI OCT 18 2013

KSZ008>012-020>024-026-034>040-054>056-058-059-190815-
/O.NEW.KTOP.FZ.W.0006.131019T0300Z-131019T1400Z/
REPUBLIC-WASHINGTON-MARSHALL-NEMAHA-BROWN-CLOUD-CLAY-RILEY-
POTTAWATOMIE-JACKSON-JEFFERSON-OTTAWA-DICKINSON-GEARY-MORRIS-
WABAUNSEE-SHAWNEE-DOUGLAS-LYON-OSAGE-FRANKLIN-COFFEY-ANDERSON-
INCLUDING THE CITIES OF...MARYSVILLE...HIAWATHA...CONCORDIA...
CLAY CENTER...MANHATTAN...ABILENE...JUNCTION CITY...TOPEKA...
LAWRENCE...EMPORIA...OTTAWA
211 PM CDT FRI OCT 18 2013

...FREEZE WARNING IN EFFECT FROM 10 PM THIS EVENING TO 9 AM CDT SATURDAY...

THE NATIONAL WEATHER SERVICE IN TOPEKA HAS ISSUED A FREEZE WARNING...WHICH IS IN EFFECT FROM 10 PM THIS EVENING TO 9 AM CDT SATURDAY.

* TIMING...10 PM THIS EVENING TO 9 AM SATURDAY.

* TEMPERATURE...TEMPERATURES ARE FORECAST TO RANGE FROM 28 TO 32 BY SUNRISE SATURDAY.

* IMPACTS...THE FREEZING TEMPERATURES COULD KILL UNPROTECTED VEGETATION.

PRECAUTIONARY/PREPAREDNESS ACTIONS...

REMEMBER...A FREEZE WARNING MEANS HAZARDOUS FREEZING CONDITIONS ARE IMMINENT OR HIGHLY LIKELY.

THOSE WITH AGRICULTURAL INTERESTS ARE ADVISED TO HARVEST OR PROTECT TENDER VEGETATION. ALSO...POTTED PLANTS NORMALLY LEFT OUTDOORS SHOULD BE COVERED OR BROUGHT INSIDE AWAY FROM THE COLD.

HAZARDOUSWEATHERCONDITIONS
Freeze Warning in effect from October 18, 10:00 PM CDT until October 19, 09:00 AM CDT
Hazardous Weather Outlook
Snow/Sleet
High: 48 °F
THIS
AFTERNOON
Snow/Sleet
Low: 31 °F
TONIGHT
Morning
Frost
High: 63 °F
SATURDAY
Mostly
Clear
Low: 42 °F
SATURDAY
NIGHT
Sunny
High: 68 °F
SUNDAY
Partly
Cloudy
Low: 47 °F
SUNDAY
NIGHT
Mostly
Sunny
High: 57 °F
MONDAY
Partly
Cloudy
Low: 38 °F
MONDAY
NIGHT

o. The basis for the conclusion that the noncompliance will not be of potential detriment to the public health and safety.

WCNOC has evaluated whether or not a significant hazards consideration is involved with the requested enforcement discretion by focusing on the three standards set forth in 10 CFR 50.92(c) as discussed below:

(i) Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed request does not adversely affect accident initiators or precursors nor alter the design assumptions or the manner in which the plant is normally operated and maintained. The proposed request does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. The proposed request is consistent with safety analysis assumptions, which apply when the plant is operating in compliance with LCO requirements.

Therefore, the proposed request does not involve a significant increase in the probability or consequences of an accident previously evaluated.

(ii) Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

With respect to any new or different kind of accident, there are no proposed design changes nor or there any changes in the method by which any safety related plant SSC performs its specified safety function. The proposed request will not affect the normal method of plant operation or change any operating parameters. No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures will be introduced as a result of this request.

The proposed request will not alter the design or performance of the 7300 Process Protection System, Nuclear Instrumentation System, Solid State Protection System, Balance of Plant Engineered Safety Features Actuation System, Main Steam and Feedwater Isolation System, or Load Shedder and Emergency Load Sequencers used in the plant protection systems.

The request does not involve a physical modification of the plant. There are no alterations to the parameters within which the plant is normally operated. No changes are being proposed to the procedures relied upon to mitigate a design basis event. The request does not have a detrimental impact on the manner in which plant equipment operates or responds to an actuation signal.

Therefore, the proposed request does not create a new or different kind of accident from any accident previously evaluated.

(iii) Do the proposed changes involve a significant reduction in a margin of safety?

Response: No

There will be no effect on those plant systems necessary to assure the accomplishment of protection functions associated with reactor operation or the Reactor Coolant System. The will be no impact on the overpower limit, departure from nucleate boiling ratio (DNBR) limits, heat flux hot channel factor, nuclear enthalpy rise hot channel factor, loss of coolant accident peak cladding temperature, peak local power density, or any other limit and associated margin of safety. Required shutdown margins in the CORE OPERATING LIMITS REPORT will not be changed.

The proposed request does not eliminate any surveillances or alter the Frequency of surveillances required by the TSs.

Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Based on the above evaluations, WCNOC concludes that the activities associated with the above described enforcement discretion request present no significant hazards consideration under the standards set forth in 10 CFR 50.92 and as such, would not be a potential detriment to the public health and safety.

p. The basis for the conclusion that the noncompliance will not involve adverse consequences to the environment.

WCNOC has determined that the proposed amendment would not change requirements with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. This request for enforcement discretion meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) as specified below:

(i) Involves no significant hazards consideration.

As demonstrated in Section o. above, this request does not involve any significant hazards consideration.

(ii) There is no significant change in the types of or significant increase in the amounts of any effluents that may be released offsite,

The request does not involve a change to the facility or operating procedures that would cause an increase in the amounts of effluents or create new types of effluents.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The request would not adversely affect the operation of the reactor and would not affect any system that would affect occupational radiation exposure. The proposed request does not create additional exposure to utility personnel nor affect radiation levels that are present. The request will not result in any increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

q. A statement that the request has been approved by the facility organization that normally reviews safety issues (Plant Safety Review Committee).

This request has been approved by the WCNOC Plant Safety Review Committee.

r. A commitment is required that the written NOED request will be submitted within 2 working days and the follow-up amendment will be submitted within 4 working days of verbally granting the NOED. State if the NRC has agreed during the teleconference that a follow-up amendment is not needed.

Information associated to the verbal NOED request will be submitted to the NRC by close of business on October 22, 2013.

This request for enforcement discretion is a one-time only extension of the Completion Time to complete restoration activities on the 'A' train Class 1E Electrical Equipment Air Conditioning System (SGK05A) due to a faulty pressure sensing switch. A follow-up license amendment request is not required as the verbal request for an NOED was denied.

s. If the NOED request is a natural event NOED, provide the following additional information:

Not applicable, this is not a natural event NOED request.