

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John P. Broschak
Vice President Engineering

February 26, 2014
ET 14-0010

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, WCNOG, "Issuance of Order to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation"
 - 2) NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012
 - 3) NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,'" Revision 1, dated August 2012
 - 4) Letter ET 12-0028, dated October 29, 2012, from J. P. Broschak, WCNOG, to USNRC
 - 5) Letter WO 13-0015, dated February 28, 2013, from R. A. Smith, WCNOG, to USNRC
 - 6) Letter ET 13-0026, dated August 28, 2013, from J. P. Broschak, WCNOG, to USNRC

Subject: Docket No. 50-482: Wolf Creek Nuclear Operating Corporation's Second Six-Month Status Report for the Implementation of Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"

Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 (Reference 1) to Wolf Creek Nuclear Operating Corporation (WCNOG). Reference 1 was immediately effective and directs WCNOG to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

A001
NRR

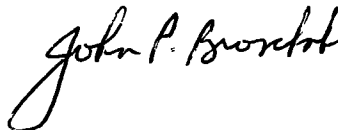
Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an Overall Integrated Plan (OIP) pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2.

Reference 4 provided the WCNOG initial status report regarding mitigation strategies. Reference 5 provided the WCNOG OIP. Reference 6 provided the first six-month status report for the implementation of Order EA-12-051.

Reference 1 requires submission of a status report at six-month intervals following submittal of the OIP. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the second six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the submittal of Reference 6, including any changes to the compliance method, schedule, or need for relief and the basis for requests for relief, if any.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4085, or Mr. Michael J. Westman at (620) 364-4009.

Sincerely,



John P. Broschak

JPB/rit

Attachment

cc: M. L. Dapas (NRC), w/a
C. F. Lyon (NRC), 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 26th day of Feb., 2014.



Gayle Shepherd
Notary Public

Expiration Date 7/24/2015

Wolf Creek Nuclear Operating Corporation's Second Six-Month Status Report for the Implementation of Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation"

Wolf Creek Nuclear Operating Corporation (WCNOC) developed an Overall Integrated Plan (OIP) (Reference 1), documenting the modification with regard to Reliable Spent Fuel Pool (SFP) Instrumentation in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the first six-month status report, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

1. Milestone Accomplishments

WCNOC has selected and entered into a purchase agreement to procure SFP level instruments that, when installed, will meet criteria designated in the OIP (Reference 1).

2. Milestone Schedule Status

There are no changes to the status of the milestones submitted in the OIP (Reference 1). Provided is the activity status of each item, and whether the expected completion date has changed. The dates are planning dates and are subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Commence Engineering and Design	1Q2013	Complete	-
Complete Design	4Q2013	Complete	-
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	-
Update 2	Feb 2014	Complete	-
Update 3	Aug 2014	Not Started	-
Update 4	Feb 2015	Not Started	-
Receipt of SFP Instruments	3Q2014	Not Started	-
Complete SFP Instrumentation Procedures & Training	4Q2014	Not Started	-
SFP Instruments Operational	1Q2015	Not Started	-

3. Changes to Compliance Method

WCNOC will no longer pursue installation of a wireless spent fuel pool level indication (SFPLI) system and will instead install a wired SFPLI system. The overall operation and layout of the system remains the same however, the level signal is now provided via installed robust cabling to the readout panels.

4. Need for Relief/Relaxation and Basis for the Relief/Relaxation

WCNOC expects to comply with the order implementation date and no relief/relaxation is required at this time.

5. Open Request for Additional Information (RAI)

Reference 4 provided WCNOC's responses to an NRC RAI (Reference 3). In Reference 4, WCNOC indicated that additional information would be provided in the February 2014 6-month status update report. Subsequently, the NRC issued the Interim Staff Evaluation (Reference 6) which was based, in part, on information provided in References 4 and 5. As noted in Reference 6, new RAI questions were developed based on the information provided in References 4 and 5. Reference 6 indicated that responses to the RAI questions should be provided in the 6-month status updates, as the information becomes available. WCNOC is still developing the information for responding to the RAI questions identified in Reference 6 and will provide the information no later than the requested date of July 31, 2014.

References

1. WCNOC Letter WO 13-0015, "Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements For Reliable Spent Fuel Pool Instrumentation," February 28, 2013. ADAMS Accession No. ML13071A419.
2. Letter from E. J. Leeds and M. R. Johnson, USNRC, to M. W. Sunseri, WCNOC, "Issuance of Order to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation," March 12, 2012. ADAMS Accession No. ML12056A044.
3. Letter from C. F. Lyon, USNRC, to M. W. Sunseri, WCNOC, "Wolf Creek Generating Station - Request for Additional Information RE: Overall Integrated Plan in Response to Order EA-12-051, 'Reliable Spent Fuel Pool Instrumentation' (TAC NO. MF0781)," July 17, 2013. ADAMS Accession No. ML13197A205.
4. WCNOC Letter ET 13-0025, "Wolf Creek Nuclear Operating Corporation's Response to Request for Additional Information Regarding Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Level Instrumentation," August 15, 2013.
5. WCNOC Letter ET 13-0026, "Wolf Creek Nuclear Operating Corporation's First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order EA-12-051)," August 28, 2013. ADAMS Accession No. ML13252A238.

6. Letter from C. F. Lyon, USNRC, to M. W. Sunseri, WCNOC, "Wolf Creek Generating Station – Interim Staff Evaluation and Request for Additional Information RE: Overall Integrated Plan in Response to Order EA-12-051, Reliable Spent Fuel Instrumentation (TAC NO. MF0781)," October 29, 2013. ADAMS Accession No. ML13295A681.