

Russell A. Smith Site Vice President and Chief Nuclear Operating Officer

March 20, 2014

WO 14-0031

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

Reference:

- 1) Letter ET 13-0023, dated August 13, 2013, from J. P. Broschak, WCNOC, to USNRC
- 2) Letter dated March 5, 2014, from C. F. Lyon, USNRC, to A. C. Heflin, WCNOC, "Wolf Creek Generating Station Request for Additional Information Re: Transition to Westinghouse Core Design and Safety Analysis (TAC No. MF2574)"

Subject:

Docket No. 50-482: Response to Request for Additional Information Regarding License Amendment Request for the Transition to Westinghouse Core Design and Safety Analysis

Gentlemen:

Reference 1 provided the Wolf Creek Nuclear Operating Corporation (WCNOC) application to revise the Technical Specifications to support transition to the Westinghouse core design and safety analysis methodologies. Reference 2 provided a Nuclear Regulatory Commission (NRC) request for additional information related to the application. The Attachment provides WCNOC's response to the request for additional information.

The additional information does not expand the scope of the application and does not impact the no significant hazards consideration determination presented in Reference 1.

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.



WO 14-0031 Page 2 of 3

There are no regulatory commitments contained in this submittal. If you have any questions concerning this matter, please contact me at (620) 364-4156, or Mr. Michael J. Westman at (620) 364-4009.

Sincerely

Russell A. Smith

RAS/rlt

Attachment

cc: T. A. Conley (KDHE), w/a

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**

Russell A. Smith, of lawful age, being first duly sworn upon oath says that he is Site Vice President and Chief Nuclear Operating Officer 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.

Russell A. Smith

Site Vice President and Chief Nuclear

Operating Officer

SUBSCRIBED and sworn to before me this 2012 day of

GAYLE SHEPHEARD Notary Public - State of Kensas

My Appt. Expires 7/24/2015

Expiration Date ____

Response to Request for Additional Information

Reference 1 provided the Wolf Creek Nuclear Operating Corporation (WCNOC) application to revise the Technical Specifications to support transition to the Westinghouse core design and safety analysis methodologies. As part of the transition to the generic Westinghouse NRC approved methodologies, instrumentation setpoint and control uncertainty calculations were performed based on the current Westinghouse Setpoint Methodology. The amendment request also included the adoption of Option A of Technical Specification Task Force (TSTF) TSTF-493-A, Revision 4, "Clarify Application of Setpoint Methodology for LSSS Functions." The amendment request included revising the Wolf Creek Generating Station (WCGS) licensing basis by adopting the Alternative Source Term radiological analysis methodology in accordance with 10 CFR 50.67, "Accident source term." Reference 2 provided a Nuclear Regulatory Commission (NRC) request for additional information related to the application.

Provided below is the response to questions EEEB-RAI-1 and EEEB-RAI-2. The specific NRC question is provided in italics.

1. <u>EEEB-RAI-1</u>

Please confirm whether any loads are being added to the WCGS emergency diesel generators (EDGs). If so, describe their impact on the capability and capacity of the EDGs. Also, describe changes, if any, being made to the EDG loading sequence to support this license amendment request (LAR).

Response: The proposed license amendment request included the adoption of Alternative Source Term (AST) radiological analysis methodology consistent with 10 CFR 50.67, "Accident source term." The design basis radiological consequence analyses performed for AST did not result in the addition of loads to the onsite standby power source (train A and train B diesel generators (DGs)) and did not result in changes to the DG loading sequence.

2. EEEB-RAI-2

Please confirm whether any components are being added to the Environmental Qualification (EQ) equipment list to comply with Title 10 of the Code of Federal Regulations, Section 50.49 (10 CFR 50.49) due to this LAR. If components are being added, describe the equipment qualification for the environmental conditions to which the components are expected to be exposed.

Response: As discussed in Reference 3, the design basis radiological consequence analyses performed for AST does not result in modifications to existing structures, systems, and components (SSC) and does not require the installation of any new SSCs. As such, no components are added to the Environmental Qualification equipment list to comply with 10 CFR 50.49, "Environmental qualification of electric equipment important to safety for nuclear power plants."

References:

- 1. WCNOC Letter ET 13-0023, "License Amendment Request for the Transition to Westinghouse Core Design and Safety Analysis," August 13, 2013. ADAMS package Accession No. ML13247A075.
- 2. Letter from C. F. Lyon, USNRC, to A. C. Heflin, WCNOC, "Wolf Creek Generating Station Request for Additional Information Re: Transition to Westinghouse Core Design and Safety Analysis (TAC No. MF2574)," March 5, 2014.
- 3. WCNOC Letter ET 14-0003, "Response to Request for Additional Information Regarding License Amendment Request for the Transition to Westinghouse Core Design and Safety Analysis," January 28, 2014. ADAMS Accession No. ML14035A224.