



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 20, 2014

Mr. Adam C. Heflin
President, Chief Executive Officer,
and Chief Nuclear Officer
Wolf Creek Nuclear Operating
Corporation
P.O. Box 411
Burlington, KS 66839

SUBJECT: WOLF CREEK GENERATING STATION, UNIT 1 – RELAXATION OF THE SCHEDULE REQUIREMENTS FOR ORDER EA-12-049 "ISSUANCE OF ORDER TO MODIFY LICENSES WITH REGARD TO REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND DESIGN BASIS EXTERNAL EVENTS"

Dear Mr. Heflin:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A735), the U.S. Nuclear Regulatory Commission (NRC) ordered Wolf Creek Nuclear Operating Corporation (WCNOC or the licensee) to take certain actions at Wolf Creek Generating Station (Wolf Creek), Unit 1, associated with the Fukushima Near-Term Task Force Recommendations. Order EA-12-049 directed that actions be taken by licensees to develop and implement strategies to maintain or restore core cooling, reactor coolant system inventory, containment cooling, and spent fuel pool (SFP) cooling capabilities during beyond design basis external events (BDBEE).

Section IV of the order states that licensees proposing to deviate from requirements contained in NRC Order EA-12-049 may request that the Director, Office of Nuclear Reactor Regulation, relax or rescind certain conditions. By letter dated March 31, 2014 (ADAMS Accession No. ML14097A072), the licensee informed the NRC of its request for a schedule relaxation of the full implementation schedule requirements for Wolf Creek, Unit 1, as prescribed in Section IV.A.2 of NRC Order EA-12-049. WCNOC has requested an extension of one additional refueling cycle for full implementation, which moves the Unit 1 implementation date from the spring of 2015 to the fall of 2016.

WCNOC's letter dated March 31, 2014, provided the following basis for the granting of scheduler relief. Recent testing of reactor coolant pump (RCP) low leakage seals has identified issues with the reliability of the current design to perform as assumed in the Wolf Creek, Unit 1 FLEX strategies. The seal vendor is performing additional analysis to develop design changes, test, and qualify new generation seals. Additionally, Wolf Creek's auxiliary feedwater (AFW) water source does not meet the seismic and missile protection requirements of Nuclear Energy Institute (NEI) 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" issued in August 2012 (ADAMS Accession No. ML12242A378), as endorsed by the staff via interim staff guidance (ISG) JLD-ISG-2012-01 "Compliance with Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" " (ADAMS Accession No. ML12229A174). WCNOC is performing

additional analysis to design and complete modifications to protect this water source. Based on the timeline to complete the above, WCNOG is requesting a schedule relaxation of one refueling cycle for implementation of the mitigation strategies for Wolf Creek, Unit 1. The requested extension would provide additional time for review of the additional analyses, and for WCNOG to safely plan, schedule, and install the new RCP seals and protected AFW water source at Wolf Creek, Unit 1.

In light of the facts presented in WCNOG'S March 31, 2014, letter, the NRC staff has determined that the licensee has presented good cause for a relaxation of the order implementation date. The extension would provide additional time to resolve the seal performance issues, protect the AFW water source, and fully design and safely implement modifications at Wolf Creek, Unit 1. These are significant actions intended to enhance the licensee's capability to cope with a BDBEE. The NRC staff also considered that, following the accident at Fukushima Dai-ichi, the NRC concluded that a sequence of events such as the Fukushima Dai-ichi accident is unlikely to occur in the United States, based on the current regulatory requirements and existing plant capabilities. Therefore, the extension of time of one additional refueling outage for Wolf Creek, Unit 1 to achieve full implementation of the requirements of the mitigation strategies order is justified and completion before December 2016 is consistent with the intent of the order. These circumstances lead the NRC staff to approve the relaxation of the order implementation date.

Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the requirement for full order implementation is relaxed for Wolf Creek, Unit 1 until the completion of the fall 2016 refueling outage.

If you have any questions, please contact James Polickoski, Mitigating Strategies Project Manager, at 301-415-5430, or at james.polickoski@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. J. Leeds', written in a cursive style.

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Docket No. 50-482

cc: Listserv

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Sincerely,

/RA/

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Docket No. 50-482

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ADAMS Accession No. ML14104A029

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