

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Steven R. Koenig
Manager Regulatory Affairs

April 6, 2015

RA 15-0029

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

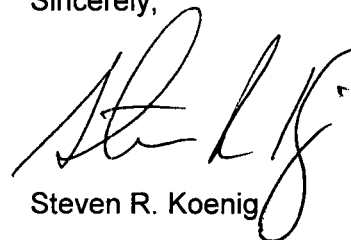
Subject: Docket No. 50-482: 2014 Annual Environmental Operating Report

Gentlemen:

The purpose of this letter is to submit the Annual Environmental Operating Report. The Annual Environmental Operating Report is being submitted pursuant to Wolf Creek Generating Station (WCGS) Renewed Facility Operating License NPF-42, Appendix B, "Environmental Protection Plan." This report covers the operation of WCGS for the period of January 1, 2014, through December 31, 2014.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4041.

Sincerely,



Steven R. Koenig

SRK/rlt

Enclosure: Wolf Creek Generating Station Annual Environmental Operating Report 2014

cc: M. L. Dapas (NRC), w/e
C. F. Lyon (NRC), w/e
N. F. O'Keefe (NRC), w/e
Senior Resident Inspector (NRC), w/e

IE77
IE25
NRR

Enclosure to RA 15-0029

Wolf Creek Generating Station
Annual Environmental Operating Report 2014
(12 pages)

WOLF CREEK GENERATING STATION
ANNUAL ENVIRONMENTAL OPERATING REPORT
2014

ENVIRONMENTAL MANAGEMENT ORGANIZATION
WOLF CREEK NUCLEAR OPERATING CORPORATION
P.O. BOX 411
BURLINGTON, KANSAS 66839

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1.0 INTRODUCTION

The 2014 Annual Environmental Operating Report is being submitted in accordance with the objectives of the Environmental Protection Plan (EPP), Appendix B to the Renewed Facility Operating License NPF-42. The purpose of this report is to demonstrate that the Wolf Creek Generating Station (WCGS) operated during 2014 in a manner protective of the environment.

2.0 ENVIRONMENTAL MONITORING

2.1 AQUATIC [EPP Section 2.1]

2.1.1 Impacts of Water Withdrawal on the Neosho River

There were no adverse impacts to the Neosho River due to water-use conflicts because river flows downstream of the makeup pumps were maintained during 2014. The WCGS Final Environmental Statement/Operating License Stage (FES/OLS, Section 5.6), NUREG-0878, postulated that makeup water withdrawal of 41 cubic feet per second (cfs) during drought conditions would extend the duration and severity of low-flow conditions below John Redmond Reservoir (JRR). This, in turn, was expected to reduce riffle habitat that would adversely affect the Neosho madtom, a federally listed threatened species.

Actual makeup water withdrawals during 2014 are summarized as follows:

Source	2014 Period	Duration (days)	Average Pump Rate (cfs)	River Flow (cfs) ⁽¹⁾		
				Avg	Min	Max
Neosho River ⁽²⁾	5/27-6/4	9	125	371	291	407
	9/14-9/15	1.6	135	541	471	611
John Redmond Storage	5/21-5/26	5.6	119	167	166	168
	6/5	0.6	133	229	229	229
	9/16-10/12	26.5	120	218	124	278
	10/15-11/10	26	117	311	299	321

(1) Flow measured at JRR spillway discharge.

(2) Before natural flows from the Neosho River are permitted by the Kansas Department of Agriculture, Division of Water Resources to be pumped, a 250 cfs minimum must be maintained downstream of the pumps. Otherwise makeup water is considered to be from JRR storage.

As shown above, average pump rates were less than average river flows measured at the JRR spillway, immediately upstream of the pumps at the Makeup Water Screenhouse (MUSH). This demonstrates that downstream flows were maintained. In addition, of the 69.3 day period makeup pumps were operated, 11.6 days were during when river flows were higher.

For comparison purposes, the 41 cfs assessed in the FES/OLS refers to a continuous annual average from JRR storage. Combining the four pumping periods, the actual 2014 pumping from JRR storage averaged 120 cfs for 58.7 days, which was equivalent to 19 cfs, when calculated on a similar, annual basis. This flow rate was lower than the 41 cfs evaluated as impacting the Neosho River during drought conditions.

Consequently, makeup pumping activities did not impact flows intended to maintain minimum desirable stream flows in the Neosho River, and no adverse impacts due to water-use conflicts occurred during 2014.

2.1.2 Oxidizing Biocide Discharges to Coffey County Lake (CCL)

Circulating Water System (CWS) Discharge:

There were no adverse impacts observed due to biocides during 2014. Biocide use at WCGS was predicted to cause periodic, appreciable mortality in a conservatively estimated 40 acres of the discharge area to CCL. However, these impacts were not expected to meaningfully affect the overall biological productivity of the lake (FES/OLS, Section 5.5.2.2). The postulated biocide levels expected to cause the impacts were from 0.68 to 1.08 mg/l of total residual chlorine at the CWS discharge (FES/OLS, Section 4.2.6.1).

Actual maximum biocide concentration measured was 0.15 mg/l, and averaged 0.09 mg/l total residual oxidant (TRO) during 2014. This level was much lower than those evaluated in the FES/OLS, thus impacts were considered to be correspondingly less. The Kansas Department of Health and Environment (KDHE) also requires, through the WCGS National Pollutant Discharge Elimination System (NPDES) permit, that biocide discharges for the CWS be less than 0.2 mg/l TRO, for a maximum of two hours per day. Consequently, biocide impacts to CCL have been less than initially evaluated in the FES/OLS, and NPDES compliance assures that this will continue.

Essential Service Water System (ESWS) Discharge:

Flow from the WCGS Service Water System (SWS) diverted through the Essential Service Water System (ESWS) was completed to provide microbiologically induced corrosion protection and sedimentation control. The KDHE established a 1.0 mg/l TRO limit for the SWS diversion through the ESWS. Actual maximum TRO was 0.73 mg/l, and averaged 0.24 mg/l during 2014. Based on this information, permitted biocide discharges did not have appreciable effects on the cooling lake environment.

2.1.3 Cold Shock

In the event of a rapid decline in plant power level during winter, fish attracted to the WCGS heated discharge could experience mortality due to a quick reduction in body temperature (cold shock). In reference to licensing document evaluations, the WCGS EPP Section 2.1 (c) states, "Cold shock effects on fish due to reactor shutdowns could cause significant mortality to aquatic species in the cooling lake."

Fish mortality due to cold shock was not observed in CCL following declines in plant power level. Two such plant shutdowns or power level decreases occurred as follows:

<u>Date</u>	<u>Duration (days)</u>
3/8 to 5/14/14	67
11/16/14	1

Fish mortality was not observed following the plant power changes. Consequently, significant impact to the fishery in CCL due to cold shock events did not occur during 2014.

2.1.4 Impingement and Entrainment

Impacts of entrainment and impingement of fish and aquatic organisms due to WCGS cooling water pumping were projected to be significant, as indicated in the WCGS EPP, Section 2.1 (d). EPP Section 2.1 states that the NRC relies on the State of Kansas for determination of the need for monitoring entrainment and impingement impacts. The KDHE requested WCGS to monitor impingement impacts for the Clean Water Act (CWA) 316 (b), Phase II regulations. This monitoring has been completed, and results have been submitted to the KDHE. Entrainment monitoring has not been required. No significant adverse impacts to the CCL fishery were identified because of impingement. Fishery management at WCGS has succeeded in controlling impingement, and minimizes potential impacts of impingement to the fishery.

2.1.5 Impacts of Coffey County Lake Discharges to the Neosho River

The WCGS NPDES permit requires that CCL discharges be sampled on the first day of each discharge and weekly thereafter until the end of each respective discharge. A discharge limit was set for pH (NPDES Outfall 004). Lake discharges typically can occur at the Blowdown Spillway and Service Spillway. During 2014, no discharges occurred at the Blowdown Spillway. There were no NPDES violations from discharges from the Service Spillway, and no detrimental effects were expected to the Neosho River water quality.

2.2 TERRESTRIAL [EPP Section 2.2]

2.2.1 Control of Vegetation in the Exclusion Zone

The composition and structure of vegetation in the 453 hectare (1120 acre) exclusion zone were selectively controlled to be compatible with the function and security of station facilities. Most areas in the immediate vicinity of the power block typically have been planted and maintained in a lawn-type condition. Other areas within the exclusion area have been mowed for security and aesthetic purposes. Tree and brush control occurred in some areas.

Various maintenance and construction activities during 2014 have caused temporary impacts to the vegetation in many areas surrounding WCGS. As projects are completed, restoration of the areas involved is expected to return the vegetation in the exclusion zone similar to previous conditions.

2.2.2 Vegetation Buffer Zone Surrounding Coffey County Lake

To create a buffer zone of at least 500 acres around CCL, as specified in EPP Section 2.2 (b), agricultural production activities were curtailed in 1980 within a border ranging from approximately 200-400 feet adjacent to the lake shoreline. This area is approximately 1440 acres. Previously grazed or hayed native grass areas were left undisturbed. Previously cultivated lands were allowed to advance through natural succession stages, or native grasses were established in these areas. Land management activities included controlled burning to enhance and/or maintain the designated buffer zone with a naturally occurring biotic community.

2.2.3 Herbicide Use for Maintenance of WCGS Structures

Herbicides were used on transmission corridors, gravel areas, railroad easements, and various land areas associated with WCGS. Application rates followed label instructions. No environmental impacts from herbicide treatment of WCGS facilities were identified.

The transmission lines associated with WCGS include the Wolf Creek-Rose Hill and a small portion of the Wolf Creek-Benton and Wolf Creek-LaCygne lines. Herbicides for bare ground control were used on various gravel areas, including the switchyard, protected area boundary, meteorological tower, storage tank berms, railroad beds, and storage yards. Noxious weed and nuisance tree/brush growth were controlled on the dam, railroad easements, and selected grassland areas around the cooling lake.

2.2.4 Waterfowl Disease Contingency Plan and Monitoring

A waterfowl disease contingency plan was maintained to provide guidance for station biologists in the event of suspected or actual disease outbreaks. The contingency plan lists appropriate federal and state wildlife agency contacts to be made by Wolf Creek Nuclear Operating Corporation (WCNOC) in the event of

such problems. During routine environmental monitoring and surveillance activities taking place over this reporting period, no waterfowl mortality attributable to disease pathogens was identified.

2.2.5 Fog Monitoring Program [EPP Subsection 4.2.1]

Fog monitoring concluded that operation of WCGS did not appreciably increase fogging incidents from that measured before operation. Visibility monitoring was initiated in December, 1983, and continued through 1987. The purpose of this study was to evaluate the impact of waste heat dissipation from CCL on fog occurrence along U.S. 75 near New Strawn, Kansas. The program was required through one year of commercial operation that started in September 1985. Upon conclusion of 1987 data collection, sufficient information was available to evaluate cooling lake fogging, and all commitments relevant to fog monitoring had been satisfied.

During 2014, there were no reports of fogging incidents in the vicinity of nearby U.S. 75 from individuals or local agencies responsible for traffic safety. Periodic fogging likely caused by the cooling lake did occur during the winter months of 2014, but was restricted to the plant site and immediate vicinity of the lake. No mitigation actions or further monitoring were warranted.

2.2.6 Wildlife Monitoring Program [EPP Subsection 4.2.2]

A wildlife monitoring program was initiated in 1982 to monitor and assess waterfowl, waterbird, and bald eagle usage of CCL. This program included transmission line collision surveys to assess collision mortality and determine potential mitigation needs. This wildlife monitoring program was to continue for at least two years following WCGS start-up (FES-OLS Section 5.5.1.2), which occurred in September 1985.

Transmission line surveys were conducted from 1983 through 1988. Monitoring of lake use by waterfowl, waterbirds, and bald eagles continued through 1996. By then, sufficient data had been collected to determine waterfowl, waterbird, and bald eagle usage of CCL. Consequently, the scope of the wildlife monitoring program was reduced. The current program consists of reviewing CCL waterfowl and bald eagle survey data collected by the Kansas Department of Wildlife, Parks and Tourism (KDWPT). If review of the KDWPT's data indicates that usage has increased from that previously documented, then additional monitoring may be initiated if warranted.

Review of waterfowl and bald eagle monitoring data for 2014 collected by the KDWPT indicate that waterfowl and waterbird usage was consistent with past years. Increased transmission line collision potential was not indicated. No disease outbreaks or widespread crop depredation attributable to waterfowl use of CCL were observed. No changes to the wildlife monitoring program were warranted.

2.2.7 Land Management Program [EPP Subsection 4.2.3]

Land management activities on all company-owned lands except within the 453 hectare (1120 acre) WCGS exclusion area were designed to achieve balances between agricultural production and conservation values. An annual management plan addressed needs and accepted techniques for land maintenance, soil conservation, and wildlife management. These included the repair or construction of soil conservation structures, wetland areas, and permanent vegetative covers. An environmental education area was improved and maintained as part of the land management program. The land management program continued to balance agriculture production and conservation values.

3.0 ENVIRONMENTAL PROTECTION PLAN REPORTING REQUIREMENTS

3.1 PLANT DESIGN OR OPERATION CHANGES [EPP Section 3.1]

Plant design or operational changes were evaluated for potential significant affects to the environment, the presence of which would constitute an unreviewed environmental question (UEQ) per the EPP. Evaluations completed during 2014 demonstrate that significant impacts to the environment would not occur, and that no changes constituted a UEQ. Below are brief descriptions of these evaluations completed in 2014.

1. Essential Service Water (ESW) Pump-house Modification

Modification scope included installation of steel missile shields for new warming lines, concrete piling and soil/riprap backfill in lake, access road and wave scour protection, and conduit relocation. Environmental or regulatory interfaces that were identified and addressed included:

- a. Temporary air emission source provisions,
- b. Storm Water Pollution Prevention Plan (SWPPP) development, approval, and implementation,
- c. U. S. Corp of Engineers Section 404 authorization.

2. Essential Service Water Underground Piping Replacement

The scope of this evaluation included ESW pipeline crossing of CWS piping, marine work associated with submerged discharge piping and vault. Environmental or regulatory interfaces that were identified and addressed included:

- a. Temporary air emission source provisions,
- b. Solid waste and debris management,

- c. Superfund Amendment Reauthorization Act (SARA) considerations with chemical volume accounting,
 - d. U. S. Corp of Engineers Section 404 authorization,
 - e. Storm Water Pollution Prevention (SWPP) considerations.
3. Storm Sewer Replacement Resulting from ESW Buried Piping Replacement Project.

Portions of the site storm sewer system required removal and replacement when underground ESW piping was replaced. Environmental or regulatory interfaces that were identified and addressed included:

- a. Temporary air emission source provisions,
- b. SWPP considerations.

4. Site Grading and Drainage Changes

Site grading and drainage changes were necessary to mitigate water intrusion into electrical manholes and the duct bank network. Environmental or regulatory interfaces that were identified and addressed included:

- a. Temporary air emission source provisions,
- b. Solid waste and debris management,
- c. SARA consideration with chemical volume accounting,
- d. SWPP considerations.

5. New Site Oil/Water Separator Installation

A new site oil/water separator was required as a result of the ESW buried piping replacement project. Environmental or regulatory interfaces that were identified and addressed included:

- a. Temporary air emission source provisions,
- b. Solid waste and debris considerations,
- c. Spill Prevention and Countermeasure Control (SPCC) plan considerations,
- d. SWPP considerations.

6. Electrical Duct Bank Network Sump Installation

Water accumulation in electrical manholes and in the duct bank network required sump pump installation for removal. Environmental or regulatory interfaces that were identified and addressed included:

- a. Temporary air emission source provisions,
- b. Solid waste and debris considerations,
- c. Groundwater Protection Program provisions.

7. Site Dewatering Well Installation Design

This design scope included installation of a site dewatering well network for removal of groundwater in strategic areas around site structures. Environmental or regulatory interfaces that were identified and addressed included:

- a. Temporary air emission source provisions,
- b. SWPP considerations,
- c. Groundwater Protection Program provisions,
- d. Kansas Department of Agriculture, Division of Water Resources groundwater approbation requirements.

8. Security Gate Motor Operator Installation

Scope of this project included foundation, electrical duct work, and gate motor installation on a security gate. Environmental or regulatory interfaces that were identified and addressed included:

- a. Temporary air emission source provisions,
- b. SWPP considerations.

9. Cathodic Protection System Installation

A cathodic protection system was reinstalled after the ESW buried piping replacement project. Environmental or regulatory interfaces that were identified and addressed included:

- a. Temporary air emission source provisions,
- b. SWPP considerations.

10. Biocide Treatment Equipment Installation

Chemical injection equipment was installed on fire pump suction strainers to prevent zebra mussel fouling. Environmental or regulatory interfaces that were identified and addressed included:

- a. Assessment and approval before use by the KDHE of chemical application and effluent changes to the environment.

11. New Chemical Treatment System Operation

Installation of new chemical injection system at the ESW pumphouse required new written procedures before placing into service. Environmental or regulatory interfaces that were identified and addressed included:

- a. NPDES compliance considerations with corrosion inhibitor and biocide application.

12. Uninterruptible Power Supplies

Telephone systems in multiple site facilities required uninterruptible power supplies involving batteries. Environmental or regulatory interfaces that were identified and addressed included:

- a. SARA consideration with chemical volume accounting.

13. Transformer Replacement Project

An existing transformer was replaced with a larger capacity one to accommodate electric needs of a Fukushima Diverse and Flexible Strategies building. Environmental or regulatory interfaces that were identified and addressed included:

- a. SPCC plan considerations.

14. Sewage Line Rerouting

A sewage line required relocation by the Communications Corridor to accommodate the ESW Water Hammer Mitigation Project. Environmental or regulatory interfaces that were identified and addressed included:

- a. Groundwater Protection Program provisions.

15. Essential Service Water Hammer Mitigation Project Design and Installation

The ESW Water Hammer Mitigation Project included pipe chase foundation and foundation wall design and installation. Environmental or regulatory interfaces that were identified and addressed included:

- a. Groundwater Protection Program provisions,
- b. SWPP considerations,
- c. Solid waste and debris considerations,
- d. Kansas Department of Agriculture, Division of Water Resources construction groundwater dewatering permit acquisition.

16. Backup Generator Installation

A small propane generator was required for Security Building duct bank, perimeter drain, and sewer sumps. Environmental or regulatory interfaces that were identified and addressed included:

- a. Permanent air emission source considerations and permitting.

3.2 NON-ROUTINE ENVIRONMENTAL REPORTS [EPP Section 5.4.2]

3.2.1 Submitted Non-routine Reports

There were no environmental reports involving significant non-routine impacts submitted to the NRC during 2014.

3.2.2 Unusual or Important Environmental Event Evaluations [EPP Section 4.1]

No unusual or important environmental events that indicated or resulted in a significant environmental impact related to plant operations occurred during 2014.