

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Cleveland Reasoner
Site Vice President

April 26, 2017

WO 17-0042

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

- Reference:
- 1) NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," dated November 2012
 - 2) Letter dated March 28, 2013, from M. Thaggard, USNRC, to S. Perkins-Grew, NEI, "U.S. Nuclear Regulatory Commission Review and Endorsement of NEI 99-01, Revision 6, Dated November, 2012 (TAC No. D92368)"
 - 3) Letter WO 16-0045, dated September 30, 2016, from C. O. Reasoner, WCNO, to USNRC
 - 4) Electronic mail dated February 15, 2017, from S. P. Lingam, USNRC, to W. T. Muilenburg, WCNO
 - 5) Letter WO 17-0013, dated March 16, 2017, from C. O. Reasoner, WCNO, to USNRC

Subject: Docket No. 50-482: Supplement to RAI Response Regarding Adopting New EAL Scheme

To Whom It May Concern:

Reference 1 provides the Nuclear Energy Institute's (NEI) revised Emergency Action Level (EAL) scheme, which was endorsed by the Nuclear Regulatory Commission (NRC) as documented in Reference 2. Wolf Creek Nuclear Operating Corporation (WCNO) submitted a License Amendment Request (LAR) in Reference 3 to adopt NEI's revised EAL scheme. The NRC provided a request for additional information (RAI) contained in Reference 4 pertaining to this LAR. WCNO then submitted its response to the RAI in Reference 5.

A phone conference was held on April 11, 2017, between NRC staff and WCNO personnel regarding the definition of "visible damage" as it relates to hazardous events in certain EALs. This letter supplements the information provided in Reference 5 in regards to the definition of "visible damage" as applied to EAL bases SA9.1 and CA6.1. The revisions to SA9.1 and CA6.1 provide clarification that an Alert should not be declared if the safety system affected by a

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hazard was not functional prior to the event. In addition, an Alert should also not be declared when the hazardous event has not caused indications of degraded performance or visible damage on a second train of the same safety system. These clarifications help provide better guidance to prevent unnecessary entry into Alert conditions. The Enclosure to this submittal provides WCNOC's EAL Technical Basis Document revised to reflect the changes made to EAL bases SA9.1 and CA6.1.

WCNOC has the following upcoming activities scheduled: Initial Licensed Operator Exam in October 2017, Emergency Plan Evaluated Exercise in November 2017, Refueling Outage 22 in March 2018, and Licensed Operator Requalification Exam in June 2018. Due to the schedule of these activities, and to make sure personnel can be properly trained on the new EAL scheme, WCNOC requests an implementation date of September 30, 2018.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4171, or Cynthia R. Hafenstine (620) 364-4204.

Sincerely,



Cleveland Reasoner

COR/rit

Enclosure: Revised EAL Technical Basis Document

cc: K. M. Kennedy (NRC), w/e
B. K. Singal (NRC), w/e
N. H. Taylor (NRC), w/e
Senior Resident Inspector (NRC), w/e