



Cleveland Reasoner
Site Vice President

May 9, 2018

WO 18-0016

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

Subject: Docket No. 50-482: License Amendment Request (LAR) for Revision to the Emergency Plan

To Whom It May Concern:

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Wolf Creek Nuclear Operating Corporation (WCNOC) hereby requests an amendment to Renewed Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS). This request proposes changes to the Emergency Plan for Wolf Creek Nuclear Operating Corporation, Wolf Creek Generating Station to 1) reduce the number of required Emergency Response Organization (ERO) positions; 2) standardize Technical Support Center activation time to 75 minutes; 3) replace the current normal full-time work hours licensed medical practitioner position with First Aid Responders; and 4) remove reference to performing dose assessment using containment pressure indication.

Attachment I provides an evaluation and justification for the proposed changes. Attachment II contains a summary of proposed changes to the Emergency Plan. Attachment III provides the analysis of all ERO positions being reduced or eliminated and evaluates the transfer of tasks to remaining ERO positions. Attachment IV provides a historical summary of staffing and augmentation response time changes. Attachment V provides a Letter of Concurrence from the State of Kansas and Coffey County. Enclosure I contains the proposed marked-up of Procedure AP 06-002, Radiological Emergency Response Plan (RERP). Enclosure II contains the proposed revised Emergency Plan (clean copy). Enclosure III provides the On-Shift Staffing Analysis Report. Enclosure IV provides the Wolf Creek Nuclear Operating Corporation FLEX Staffing Study.

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92, "Issuance of amendment." The basis for this determination is included in Attachment I. Pursuant to 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," Section (b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment.

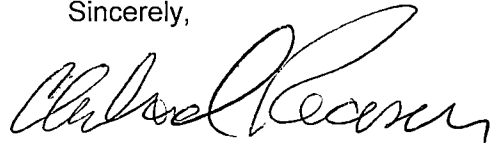
*Ax45
NRR*

The WCNOG Plant Safety Review Committee has reviewed this amendment application. In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," a copy of this amendment application, with attachments is being provided to the designated Kansas State official.

WCNOG requests review and approval of the proposed amendment by May 1, 2019. Once approved, the amendment will be implemented within 180 days from the date of issuance. The extended implementation period is desired in order to complete update of implementing procedures, and training; and will allow consideration of refueling outages and training cycles.

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

Sincerely,



Cleveland Reasoner

COR/rlt

Attachments: I Evaluation of Proposed Change
II Emergency Plan Change Summary
III ERO Position Matrix
IV Summary of Shift Staffing and Augmentation Response Time Historical Requirements and Proposed Changes
V Letter of Consultation and Concurrence from Off-site Response Organizations Acknowledgement of Opportunity to Review and Support WCNOG License Amendment Request

Enclosures: I Proposed Markup of Procedure AP 06-002, Radiological Emergency Response Plan (RERP)
II Revised (clean copy) Procedure AP 06-002, Radiological Emergency Response Plan (RERP)
III Wolf Creek Nuclear Operating Corporation On-Shift Staffing Analysis, August 2017
IV Wolf Creek Nuclear Operating Corporation FLEX Staffing Study

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

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Cleveland Reasoner, of lawful age, being first duly sworn upon oath says that he is Site Vice President 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 *Cleveland Reasoner*
Cleveland Reasoner
Site Vice President

SUBSCRIBED and sworn to before me this 9th day of May, 2018.



Gayle Shephard
Notary Public

Expiration Date 7/24/2019