

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Jaime H. McCoy
Site Vice President

November 15, 2018

WO 18-0047

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

- Reference:
- 1) Letter ET 17-0001, dated January 17, 2017, from J. H. McCoy, WCNOC, to USNRC
 - 2) Letter dated January 8, 2018, from D. C. Morey, USNRC, to J. A. Gresham, Westinghouse Electric Company, "Verification Letter of the Approval Version of Westinghouse Electric Company Topical Report WCAP-17642-P/NP, Revision 1, "Westinghouse Performance Analysis and Design Model (PAD5)" (TAC No. MF3096)"
 - 3) Letter dated October 4, 2018, from B. K. Singal, USNRC, to A. C. Heflin, WCNOC, "Wolf Creek Generating Station, Unit 1 – Request for Additional Information Re: Licensing Amendment Request for Transition to Westinghouse Methodology for Selected Accident and Transient Analyses (CAC No. MF9307, EPID L-2017-LLA-0211)"
- Subject: Docket No. 50-482: Timeline for Response to RAI for License Amendment Request to Revise Technical Specifications to Transition to Westinghouse Core Design and Safety Analysis Including Adoption of Alternative Source Term

To Whom It May Concern:

Reference 1 provided the Wolf Creek Nuclear Operating Corporation (WCNOC) application to revise the Wolf Creek Generating Station (WCGS) Technical Specifications (TS). The proposed amendment would support transition to the Westinghouse Core Design and Safety Analysis methodologies. In addition, the amendment request included revising the WCGS licensing basis by adopting the Alternative Source Term radiological analysis methodology in accordance with 10 CFR 50.67, "Accident Source Term." Reference 3 provided a request for additional information (RAI) related to the application. The RAI consisted primarily of questions asking how the phenomenon of thermal conductivity degradation (TCD) is accounted for in the analyses performed for transients not associated with a loss of coolant accident (LOCA).

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Specifically questions were asked about two transients of concern: control rod ejection and main steam line break. On October 30, 2018, a public meeting was held between WCNO, Westinghouse, and Nuclear Regulatory Commission (NRC) staff to discuss a successful resolution to the questions posed in the RAI. A follow-up phone call was held between WCNO, Westinghouse, and NRC staff on November 6, 2018. During this phone call, WCNO agreed to provide a timeline for responding to the RAI. This submittal provides that timeline.

To adequately demonstrate that TCD is accounted for in these two analyses, Westinghouse will utilize the PAD5 model, approved in Reference 2. Due to the late issuance of the RAI, WCNO and Westinghouse personnel will work on an expedited schedule to complete the analyses and submit a response to the RAI with enough time for NRC staff to complete their review of the LAR within the targeted 24 month review cycle.

The approved PAD5 model allows the use of a peak centerline temperature limit that is less restrictive than the current WCGS TS allow. The analysis for the 2 transients discussed above will be done with PAD5 data in accordance with the current, more restrictive TS limit. If the results of the analysis performed with the current temperature limit are successful, the response to the RAI, with the results of the analysis will be submitted no later than February 25, 2019. If the result of the analysis cannot meet the existing TS limit, an additional TS revision to relax the temperature limit, in accordance with WCAP-17642, Revision 1 will be submitted. In this case, the response to the RAI, with analytical results meeting this limit will be submitted no later than March 25, 2019.

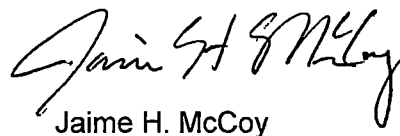
WCNO plans to notify the NRC at the earliest possible time whether or not the additional TS revision will need to be submitted (anticipated to be known by mid-January). In this case, the additional TS revision will be submitted prior to the RAI response itself to allow NRC staff adequate review time.

The information provided in this submittal 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.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4156, or Cynthia R. Hafenstine at (620) 364-4204.

Sincerely,



Jaime H. McCoy

JHM/

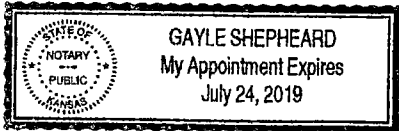
cc: K. M. Kennedy (NRC)
B. K. Singal (NRC)
K. S. Steves (KDHE)
N. H. Taylor (NRC)
Senior Resident Inspector (NRC)

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Jaime H. McCoy, 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 Jaime H McCoy
Jaime H. McCoy
Site Vice President

SUBSCRIBED and sworn to before me this 15th day of November, 2018.



Gayle Shephard
Notary Public

Expiration Date 7/24/2019