

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Richard A. Muench
Vice President Engineering

OCT 8 1998

ET 98-0054

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555-0001

Reference: 1) NRC Generic Letter 98-02, "Loss Of Reactor Coolant Inventory
And Associated Potential For Loss Of Emergency Mitigation
Functions While In A Shutdown Condition," dated May 28, 1998

2) WCNOG Letter WM 95-0022, dated February 23, 1995, from
N. S. Carns, WCNOG, to J. Lieberman, USNRC

Subject: Docket No. 50-482: Response to NRC Generic Letter 98-02,
Pursuant to 10 CFR 50.54(f)

Gentlemen:

Reference 1 requires addressees to perform, within 180 days of the date of the Reference, and pursuant to 10 CFR 50.54(f), an assessment of whether each plant's emergency core cooling systems (ECCS) include certain design features which can render the systems susceptible to common-cause failure as a result of events similar to the Wolf Creek Generating Station (WCGS) reactor coolant system (RCS) drain-down event of September 17, 1994. Reference 1 further requires addressees to prepare a description of the features of the licensee's Appendix B quality assurance program that provide assurance that the safety-related functions of the residual heat removal (RHR) system and ECCS will not be adversely affected by activities conducted at hot shutdown (such as occurred at WCGS).

WCGS design includes a common suction header for RHR and ECCS system pump suction lines, which contributed to the WCGS RCS drain-down event described in Reference 1. As noted in Reference 1, this design feature makes these systems susceptible to common-cause failure due to events similar to the WCGS RCS drain-down event of September 17, 1994.

Wolf Creek Nuclear Operating Corporation's (WCNOG) evaluations and corrective actions taken in response to the 1994 WCGS RCS drain-down event are discussed in Reference 2. Reference 2 provides WCNOG's response to Violation 482/9418-01 (EA 94-251): "Rapid drain-down of the pressurizer and partial depressurization of the reactor coolant system." As noted in Reference 2, the investigation (WCNOG Incident Investigation Team Report 94-04) of the WCGS RCS drain-down event included a review of system designs to identify any additional potential steam binding paths for the ECCS pumps. The investigation concluded that there are no other credible means of steam binding the ECCS pumps.

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P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-8831

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The information requested by Reference 1, as summarized above, is available in more detail in Reference 2. The Incident Investigation Team Report Number 94-04 provides a detailed evaluation of the event and corrective actions taken to prevent recurrence of this type of event. Both Reference 2 and the Incident Investigation Team Report Number 94-04 are available for NRC review at the plant site, as requested by Reference 1. The attachment to this letter identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4034, or Mr. Michael J. Angus at extension 4077.

Very truly yours,



Richard A. Muench

RAM/rlr

Attachment

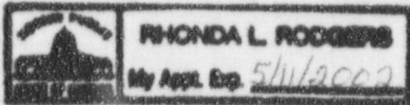
cc: W. D. Johnson (NRC)
E. W. Merschoff (NRC)
B. A. Smalldridge (NRC)
K. M. Thomas (NRC)

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Richard A. Muench, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the content thereof; that he has executed that 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 *RM Muench*
Richard A. Muench
Vice President
Engineering

SUBSCRIBED and sworn to before me this 8th day of October, 1998.



Rhonda L. Rodgers
Notary Public

Expiration Date 5/11/2002

LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Michael J. Angus, Manager Licensing and Corrective Action at Wolf Creek Generating Station, (316) 364-8831, extension 4077.

COMMITMENT	Due Date/Event
None	