



Ron Benham  
Director Nuclear Regulatory Affairs

August 11, 2020  
RA 20-0079

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Director, Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Reference: NRC Letter dated July 22, 2020, from J. W. Lubinsky, USNRC, to C. O. Reasoner, WCNOG

Subject: Docket No. 72-079: Response to the Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access for Wolf Creek Operating Corporation Independent Spent Fuel Storage Installation

Dear Commissioners and Staff:

As directed by EA-20-091, Wolf Creek Nuclear Operating Corporation (WCNOG) hereby submits information in response to the Order for Implementation of Additional Security Measures (ASM) and Fingerprinting for Unescorted Access for WCGS Independent Spent Fuel Storage Installation (ISFSI) (hereinafter "Order").

WCNOG consents to the Order as more fully set forth below, and specifically does not request a hearing on this Order. Upon implementation, WCNOG will be able to comply with the requirements described in Enclosure 1, Attachments 1 and 2 of the Order and implementation of the requirements will not cause WCNOG to be in violation of the provisions of any Commission regulation or the facility license. Implementation of the requirements described in Enclosure 1, Attachments 1 and 2 of the Order will not adversely impact the safe storage of spent fuel. The first movement of spent fuel to the Wolf Creek Generation Station (WCGS) ISFSI is currently scheduled to begin in Mid-September, 2021.

WCNOG recognizes that the Order requires WCGS to demonstrate compliance with certain security measures relative to WCGS's ISFSI no later than 365 days from July 22, 2020 or 90 days before the first day fuel is initially placed in the ISFSI, whichever is first. WCNOG is planning to use the TN-Orano NUHOMS Matrix HSM and EOS dry storage canisters Storage System at WCGS. Due to uncertainties associated with the fabrication of matrix support components, construction of the WCGS ISFSI using this technology may not be to the stage that WCNOG can demonstrate compliance with the ASM by July 22, 2021. WCNOG does agree, however, to demonstrate compliance with the requirements in Attachments 1 and 2 to the Order no later than 90 days before the first day that spent fuel is initially placed in the ISFSI.

As provided for in Enclosure 1, Attachment 2 of the Order, WCNOG has chosen to comply with the NRC approved reactor access authorization program currently in place at WCGS as an alternative means to satisfy the provisions of sections B through G of Enclosure 1, Attachment 2. WCNOG will provide periodic updates of the ISFSI project status and will report to the Commission when it has achieved full compliance with the requirements described in Enclosure 1, Attachments 1 and 2 of the Order. WCNOG will achieve full compliance with the Order no later than 90 days before the first day that spent fuel is initially placed in the ISFSI.

This letter contains one new commitment, which is described in Enclosure I to this letter. If you have any questions concerning this matter, please contact Brian Briggs at (816) 826-6219 or Ron Benham at (620) 364-4204.

Sincerely,

A handwritten signature in black ink that reads "Ron Benham". The signature is written in a cursive style with a long, sweeping underline.

Ron Benham

RDB/rit

ENCLOSURE I: LIST OF REGULATORY COMMITMENTS

CC: S. S. Lee (NRC)  
S. A. Morris (NRC)  
N. O'Keefe (NRC)  
Senior Resident Inspector (NRC)

ENCLOSURE I  
LIST OF REGULATORY COMMITMENTS

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<b>REGULATORY COMMITMENT</b>	<b>DUE DATE</b>
Achieve full compliance with the provisions of Enclosure I, Attachments 1 and 2 of the NRC issued "Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access for Wolf Creek Operating Corporation Independent Spent Fuel Storage Installation (EA-20-091)", dated July 22, 2020)	No later than 90 days before the first day that spent fuel is initially placed in the ISFSI.