Reference: Letter WO 20-0002, dated March 11, 2020, from J. H. McCoy, WCNOC, to USNRC, "Revision 33 of the Wolf Creek Generating Station Updated Safety Analysis Report"

Subject: Docket No. 50-482: Corrected Revision 33 of the Wolf Creek Generating Station Updated Safety Analysis Report

Commissioners and Staff:
Pursuant to the updating requirements of 10 CFR 50.71(e), Wolf Creek Nuclear Operating Corporation (WCNOC) submitted its Updated Safety Analysis Report (USAR), Revision 33, on March 11, 2020. The submittal satisfied the Final Safety Analysis Report (FSAR) updating requirements of the aforementioned regulation.

The enclosures to this letter are replacing the Reference enclosures in their entirety.

Attachment I to this letter provides information relative to changes in regulatory commitments. This information is provided in accordance with the guidance of Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," Revision 0, July 1999.

Attachment II to this letter describes specific technical changes that have been processed since the issuance of the USAR, Revision 32. In addition to these technical changes, editorial changes have been made and are included in Revision 33.

Attachment III to this letter provides a discussion of changes made to the Technical Requirements Manual (TRM) Revisions 66, 67 and 68.

Attachment IV to this letter provides a discussion of changes made to the Quality Assurance Program description that did not reduce the commitments and are required to be submitted to the NRC in accordance with the requirements of 10 CFR 50.71(e), Maintenance of records, making of reports. For USAR Revisions 21 through 31 from March 2008 to March 2018, this requirement was not met. This condition was identified in Condition Report 114176 and should have been included in Revision 31 of the USAR.

Attachment V to this letter provides a report describing how the effects of aging of newly-identified structures, systems, or components (SSCs) will be managed as required by 10 CFR
54.37(b). There are no newly identified SSCs that are subject to an aging management review or evaluation in the period from January 1, 2019, through December 31, 2019. However, for USAR Revisions 31 and 32, in the period from January 1, 2017, through December 31, 2018, SSCs subject to aging management have been identified and are reported herein. This condition was identified in Condition Report 140380.

Enclosure I to this letter provides the CD-ROM submittal of the Wolf Creek Generating Station (WCGS) USAR, Revision 33. This submittal satisfies the FSAR updating requirements of 10 CFR 50.71(e)(4).

Enclosure II to this letter provides a CD-ROM containing the station-controlled drawings that are considered incorporated by reference into the USAR.

Enclosure III to this letter provides a CD-ROM containing the Quality Program Manual and the Fire Hazards Analysis, both of which are incorporated by reference into the USAR.

Enclosure IV to this letter provides a CD-ROM containing the EQSD-I, EQ Summary Document Section I Program Description, and EQSD-II, Equipment Qualification Summary Document Master List Section II, both of which are incorporated by reference into the USAR.

Information from USAR Table 3.11(B)-1, Plant Environmental Normal Conditions; USAR Table 3.11(B)-2, Environmental Qualification Parameters for SNUPPS NUREG-0588 (LOCA, MSLB and HELB); USAR Table 3.11(B)-3, Identification of Safety-Related Equipment and Components: Equipment Qualification; USAR Table 3.11(B)-4, Containment Worst Case Radiation Levels (MRADs); USAR Table 3.11(B)-5, Containment Spray Requirements; USAR Table 3.11(B)-8, Exemptions from NUREG-0588 Qualification; USAR Table 3.11(B)-10, Equipment Added for NUREG-0737; and USAR Figures 3.11(B)-1 through 3.11(B)-49, were relocated from the USAR into EQSD-I and EQSD-II and are incorporated by reference into the USAR.

This letter contains no new commitments. As previously stated, changes to existing regulatory commitments are included. WCNOC has historically submitted updates to the USAR on March 11 of each year to coincide with the date of issuance of the WCGS operating license and to comply with the requirements of 10 CFR 50.71(e)(4). WCNOC considers that submittals made prior to or on March 11 satisfy the requirements of 10 CFR 50.71(e)(4).

If you have any questions concerning this matter, please contact me at (620) 364-4156, or Ron Benham at (620) 364-4204.

Sincerely,

Jaime H. McCoy

JHM/rlt

Attachment I – Regulatory Commitment Management System (RCMS) Changes
Attachment II – USAR Changes Processed Since Revision 32
Attachment III – Revisions to the Technical Requirements Manual
Attachment IV – Quality Assurance Program Changes Since USAR Revision 21
Attachment V – Report Consistent with 10 CFR 54.37(b) on How Effects of Aging of Newly-
Identified Structures, Systems, or Components will be Managed

Enclosure I – CD-ROM Containing Updated Safety Analysis Report, Revision 33
Enclosure II – CD-ROM Containing Updated Safety Analysis Report Controlled Figure
Drawings
Enclosure III – CD-ROM Containing Quality Program Manual and the Fire Hazards Analysis
Enclosure IV – CD-ROM Containing EQSD-I and EQSD-II

cc: S. S. Lee (NRC), w/a, w/e
S. A. Morris (NRC), w/a, w/e
N. O'Keefe (NRC), w/a, w/e
Senior Resident Inspector (NRC), w/a, w/e
STATE OF KANSAS  
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  
Site Vice President

SUBSCRIBED and sworn to before me this 23rd day of July, 2020.

RHONDA L. TIEMEYER  
Notary Public, State of Kansas  
My Appointment Expires January 11, 2023  
Expiration Date January 11, 2022
Attachment I to WO 20-0040

Regulatory Commitment Management System (RCMS) Changes
Commitment Changes

Commitment No. RCMS 1985-407 from letter NRCLK 86 021, dated January 16, 1986

This commitment was initiated in response to Deficiency 8540-04. Deficiency 8540-04 was issued for an inadequacy in dispatching offsite radiological monitoring teams during an emergency or a drill. RCMS 1985-407 was written in response to the deficiency and procedure changes were put in place to dispatch a minimum of 4 offsite monitoring teams (synonymous to survey teams).

Commitment Description: EPPs will be revised to indicate the dispatch of a minimum of 4 offsite monitoring teams during required drills and radiological emergencies.

Change to Commitment: Dispatch Minimum of Three Off-Site Monitoring Teams

Justification: In April of 2019, the NRC approved a Wolf Creek License Amendment Request which effectively changed the number of survey team technicians from four to three. Commitment 1985-407 is being revised to read, "RCMS 85-407, IR 8540-04, Dispatch Minimum of Three Off-Site Monitoring Teams." The change is a conforming change and fully bounded by License Amendment 220.

Commitment No. RCMS 1995-117 from letter WO 95-0123, dated August 8, 1995

This commitment was initiated in response to finding RP.8-2 during the June 1995 INPO visit. The INPO evaluation identified some early signs of potentially degrading industrial safety practices. As a result, Radiation Protection issued expectations regarding supervisory oversight and field observations of routine surveys as well as expectations of proper frisking techniques. The expectations were incorporated and reinforced through Wolf Creek training programs.

Commitment Description: Procedure AP 25B-100, "Radiation Worker Guidelines," has been revised to reduce the fixed tool contamination limit allowed for tools returned to the hot tool crib to 3000 cpm. Using lesson plans developed by health physics training, utility workers manning the tool room have been trained in tool survey technologies and how to handle contaminated tools. This training will be incorporated into the utility worker training program by December 31, 1995, to ensure new personnel are properly trained.

Change to Commitment: The commitment is being modified to align with the Nuclear Industry Standard Process suggestion to use 5000 cpm as the fixed tool contamination limit. RCMS 1995-117 is also being archived in the RCMS database because this is an INPO commitment and not an NRC commitment.

Justification: AP 25B-100, "Radiation Worker Guidelines," lists the fixed contamination limit as 3000 cpm per probe area on the tools in the hot tool room. This was called a commitment based on an INPO assist visit suggestion in 1995. Wolf Creek will be aligning with industry practice and use the Nuclear Industry Standard Process suggestion of 5000 cpm as the fixed tool contamination limit.
Commitment No. RCMS 1996-154 from letter WM 96-0081, dated July 31, 1996

This commitment was in response to NRC Enforcement Action 96-124. On January 30, 1996, the condition of inadequate essential service water system warming line flow (a condition adverse to quality) was not promptly identified and corrected. The root cause of this violation had been determined to be management failure to provide consistent management expectations in multiple examples of inadequate engineering rigor. As a result, commitment 1996-154 was incorporated into Al 30F-001, revision 0, "Engineering Personnel Work Product Evaluations," where expectations for engineering individuals were composed.

Commitment Description: An enhanced personnel evaluation process will provide for a supervisor rating of engineers' work products against a focused set of performance dimensions. Inadequate performance in these dimensions has been found to contribute to the weak engineering performance that has been observed at Wolf Creek Generating Station (WCGS). The results of these work product evaluations will form the primary basis for salary and career development and progression for engineering personnel at WCGS.

Change to Commitment:  
RCMS 1996-153 was moved to Al 05E-001, "Engineering Quality Review Team," per DRR 13-1684-P01 which canceled Al 30F-001. On September 12, 2019, Al 05E-001 was voided and the commitment was closed and archived.

Justification: Technical conscience guidance is in plant procedure Al 13E-001, "Performance Management Program," and is an INPO/WANO expectation. Current practices are embedded in design and qualification processes; the original commitment is not needed for regulatory compliance; the NRC does not rely on the commitment in lieu of taking other action; and the commitment does not minimize a recurring adverse condition.


This commitment was in response to NRC WO 97-0018, dated January 31, 1997. The design basis was not correctly translated into specifications for Configuration Change Package 07111, revision 1, which was approved with an incorrect essential service water flow rate. Specifically, the basis for the suitability of the containment air coolers, with reduced heat removal capacity, used calculations with an assumed essential service water flow rate of 4000 gpm rather than the actual flow rate of 2000 gpm available to the coolers. As a result, commitment 1997-043 was incorporated into Al 30F-001, revision 0, "Engineering Personnel Work Product Evaluations," which prompted interdepartmental support for engineering products.

Commitment Description: Work product evaluations will be revised to reinforce the expectation of proper use and review of the design information database and appropriate cross disciplinary technical reviews. The revisions will be completed by February 28, 1997.
Change to Commitment: RCMS 1997-043 was moved to Al 05E-001, "Engineering Quality Review Team," per DRR 13-1684-P01 which canceled Al 30F-001. On September 12, 2019, Al 05E-001 was voided and the commitment was closed and archived.

Justification: Technical conscience guidance is in plant procedure Al 13E-001, "Performance Management Program," and is an INPO/WANO expectation. Current practices are embedded in design and qualification processes; the original commitment is not needed for regulatory compliance; the NRC does not rely on the commitment in lieu of taking other action; and the commitment does not minimize a recurring adverse condition.

Commitment No. RCMS 2000-014 from letter CO 00-0003, dated March 13, 2000

On February 9, 2000, while reviewing an NRC Inspector’s concern associated with a calibration calculation, Wolf Creek personnel determined that the method used to measure Sodium Hydroxide (NaOH) level in the Spray Additive Tank could result in the level of the tank being lower than that allowed by Technical Specifications (TS). The level was determined to be approximately 100 gallons lower than required by TS Surveillance Requirement (SR) 3.6.7.2. The condition had existed for longer than the allowed out of service time and was reportable under 10 CFR 50.73(a)(2)(i)(B), any operation or condition prohibited by TS. This was reported in Letter CO 00-0003, dated March 13, 2000 which included a Wolf Creek commitment for satisfying TS SR 3.6.7.2. STS EN-005, “Containment Spray Additive Tank Volume Verification,” was developed to verify compliance by using the local sight glass.

Commitment Descriptions: A new procedure will be developed to specify use of the sight glass for level verification until more accurate methods are developed to allow use of the level indicators. The new procedure will be issued prior to the next required surveillance.

Change to Commitment: STS EN-005, "Verifying Containment Spray Additive Tank Volume," was developed to document satisfying SR 3.6.7.2. STS EN-005 follows the engineering recommendation to verify compliance by using the local sight glass. See PIR 2000-0405 and PIR 2000-0394.

Justification: STN IC-461/462, “Channel Calibration Spray Additive Tank Level Loop ENLPL0017/ENLPL0019,” were performed in January 2019. The work calibrated level indication in the main control room. The sight glass however has been chosen to be the preferred level indication for satisfying TS SR 3.6.7.2. The level indicators in the main control room will remain a diverse method for determining tank level.

Commitment No. RCMS 2006-208 from letter ET 07-0016, dated May 10, 2007

This commitment was submitted with letter ET 06-0016, dated September 27, 2006, in reference to Wolf Creek’s application for License Renewal. A comprehensive commitment list was later submitted with ET 07-0016, dated May 10, 2007. All commitments were numbered sequentially to provide a running total for the NRC. Commitment number 11 states, “The Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program is a new program that will be implemented prior to the period of extended operation. For those systems or components where inspections of opportunity are insufficient, an inspection will be
conducted prior to the period of extended operation to provide reasonable assurance that the intended functions are maintained. Due: March 11, 2025”

**Commitment Description:** The Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components program is a new program that will be implemented prior to the period of extended operation. At a minimum, in each 10-year period during the period of extended operation, a representative sample of 20% of the population (defined as components having the same combination of material, environment, and aging effect) or a maximum of 25 components per population is inspected. (Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, LRA Appendix A, Section A1.22)

**Change to Commitment:** The commitment has been incorporated into procedure AP 12-002, “Internal/External System Cleanliness.” Aging Management Program, WCLR-09, “Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components B2.1.22 NUREG 1801 Program XI.M38 Aging Management Program,” has been approved and implemented. Procedure AP 12-002 has been revised to document the material condition of components when the systems are opened during maintenance activities and attached to the Work Order for documentation (updated 4/5/17). This commitment was updated under USARCR 2018-020, based on GALL rev 2. Criteria for inspecting components where opportunities are insufficient are changed.

**Justification:** WCLR-09 is being updated to revise the internal inspection program after entering the period of extended operation (PEO). LR-ISG 2012-02, “Aging Management of Internal Surfaces, Fire Water, Atmospheric Storage Tanks and Corrosion Under Insulation,” allows the inspections to start after entering PEO. LR-ISG 2012-02 states, “In each 10-year period during PEO the licensee ensures that 20 percent of each population of in-scope components with a maximum sample size of 25 components have been inspected. Licensees that already hold a renewed license should treat this guidance as OE and take actions as appropriate to ensure aging management programs are and will remain effective.”

**Commitment No. RCMS 2019-509 from letter ET 19-0013, dated May 2, 2019**

This commitment was made in letter ET 19-0013, “Implementation Date for License Amendment Request for the Transition to Westinghouse Core Design and Safety Analyses.” This letter followed ET 17-0001, “License Amendment Request for the Transition to Westinghouse Core Design and Safety Analyses.” The request was to revise the Wolf Creek licensing basis by adopting the Alternative Source Term radiological analysis methodology in accordance with 10 CFR 50.67, “Accident Source Term.” ET 19-0013 requested, that when the Amendment was approved, the implementation date would be that of entry into Mode 2 from Refueling Outage 23 (RF23).

**Commitment Description:** Upon entry into Mode 2, the Technical Specifications, Technical Specifications Bases, Core Operating Limits Report and the Technical Specification for TSTF-529 need to be released by Document Services.

**Change to Commitment:** The Technical Specifications and Technical Specification Bases were released on October 24, 2019. The Core Operating Limits Report for Cycle 24 was
released on October 22, 2019. No further actions are needed. This commitment is being closed.

**Justification:** License Amendment 221 was approved by the NRC on May 31, 2019. Supporting documents were released upon entry into Mode 2 of Cycle 24. This was a one-time commitment.
Attachment II to WO 20-0040

USAR Changes Processed Since Revision 32
<table>
<thead>
<tr>
<th>USAR Change Request</th>
<th>Description</th>
<th>Page</th>
<th>Table: 7.5-1</th>
<th>Sheet: 2</th>
<th>Table: 7.5-1</th>
<th>Sheet: 4</th>
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<tbody>
<tr>
<td>19-003</td>
<td>REVISE THE USAR TO REFLECT SPRAY ADDITIVE TANK LEVEL LOOP INSTRUMENTATION IS ONLY REQUIRED TO FULFILL MISSION UNDER NORMAL ENVIRONMENTAL CONDITIONS. CHANNEL ACCURACY IS APPLICABLE UNDER NORMAL ENVIRONMENTAL CONDITIONS ONLY.</td>
<td>7.5-1</td>
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<td>7.5-1</td>
<td>4</td>
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<td>19-004</td>
<td>REVISE THE USAR TO REFLECT THE REPLACEMENT OF THE TECHNICAL SUPPORT CENTER FIRE SUPPRESSION SYSTEM. THE COMPUTER ROOM AND UNDERFLOOR AREAS ARE NO LONGER PROTECTED BY HALON 1301. DUPONT/CHEMOURS FE-25 IS USED INSTEAD OF HALON 1301.</td>
<td>9.5-13</td>
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<td>19-005</td>
<td>CANCELED</td>
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19-007 REVISE THE USAR TO INCORPORATE EDITORIAL CORRECTIONS. THIS INCLUDES SPELLING AND GRAMMAR CORRECTIONS, UPDATING FOR THE

USAR Change Request Description

KCP&L AND WESTAR MERGER AND THE FORMATION OF EVERGY, CORRECTING A HISTORICAL ERROR, AND UPDATING CHAPTER 13 TO REFLECT THE CURRENT MANAGEMENT STRUCTURE.


Figure: 8.2-1 Figure: 13.1-1

19-008 CANCELED

19-009 REVISE THE USAR TO UPDATE SECTION 8.1.4.3 TO BETTER ALIGN WITH REGULATORY GUIDE 1.75 AND IEEE 384-1992 FOR THOSE CIRCUITS AND ELECTRICAL EQUIPMENT THAT CONTAIN OR ARE ASSOCIATED WITH CLASS 1E CIRCUITS OR ELECTRICAL EQUIPMENT.


19-010 REVISE THE USAR TO REFLECT A CHANGE IN THE TIME IT TAKES FOR AMMONIA TO REACH THE TOXIC LIMIT IN THE CONTROL ROOM, AFTER DETECTION, FROM TWO MINUTES TO SEVEN MINUTES. THE MINIMUM REQUIRED CONTROL ROOM CREW, AS A WHOLE, WILL DON SCBA WITHIN SEVEN MINUTES WHILE MAINTAINING THAT, INDIVIDUALLY, EACH OPERATOR WILL DON SCBA WITHIN TWO MINUTES.

Page: 2.2-20

Table: 6.4-1 Sheet: 8

19-011 REVISE THE USAR TO REMOVE THE NAMES AND RESUMES OF THOSE CURRENTLY IN KEY MANAGERIAL POSITIONS. THE REPORTING STRUCTURE IN TEXT FORMAT IS ALSO BEING REMOVED BUT IS MAINTAINED IN FIGURES. THE INFORMATION BEING REMOVED IS ON FILE IN HUMAN RESOURCES. TABLE 18.1-1 IS BEING DELETED. THIS TABLE IS THE ISEG CROSS REFERENCE TABLE AND LISTS SPECIFIC PROCEDURES THAT IMPLEMENT THE ISEG FUNCTIONS. THE USAR WILL NOW STATE THE ISEG FUNCTIONS
<table>
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<th>USAR Change Request</th>
<th>Description</th>
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<tr>
<td>ARE IMPLEMENTED THROUGH ADMINISTRATIVE PROCEDURES. THESE CHANGES WILL ELIMINATE THE NEED TO UPDATE THE USAR EVERY TIME AN ORGANIZATIONAL CHANGE IS MADE OR WHEN A PROCEDURE NAME OR NUMBER CHANGES.</td>
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<tr>
<td>Table: 18.1-1</td>
<td>Sheet: 1</td>
</tr>
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</table>

19-012 REVISE THE USAR TO REFLECT THE REMOVAL OF LOCAL CONDENSATE STORAGE TANK LEVEL INDICATION. THE LEVEL IS INDICATED ON COMPUTER POINT APL0004 IN THE CONTROL ROOM AT ALL TIMES.

Page: 9.2-42 | Page: 9.2-43

19-013 REVISE THE USAR TO CORRECT THE TESTING PERIODICITY OF EXTRACTION NONRETURN VALVES FROM DAILY TO WEEKLY.

Page: 10.2-12

19-014 REVISE THE USAR TO CLARIFY THAT THE BLOWDOWN RATES CALCULATED USING UPSET CONDITIONS (AMONGST OTHER CONDITIONS) IS SPECIFIC TO THE CALCULATION OF JET IMPINGEMENT LOADS AND IN TURN THEIR EFFECT ON THE SUPPORT/RESTRAINT REQUIREMENTS. THIS CLARIFICATION INVOLVES CHANGING AN "AND" TO A "FOR."

Page: 3.6-2

19-015 REVISE THE USAR TO REFLECT THE INSTALLATION OF TEMPORARY MODIFICATION (TMO) 16-004-GB WHICH IS A TEMPORARY CHILLER THAT HAS BEEN INSTALLED DUE TO DAMAGE SUSTAINED TO THE "B" CENTRAL CHILLER FOLLOWING OPERATION WITH NO LUBRICATION OIL. THIS
TEMPORARY CHILLER WILL BE CONNECTED AND IN SERVICE UNTIL A PERMANENT REPLACEMENT FOR THE DAMAGED CHILLER CAN BE INSTALLED.

USAR Change Request Description

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<th>USAR Change Request</th>
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<td>Page: 9.3-2</td>
<td>Page: 9.3-3</td>
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<tr>
<td>Table: 9.3-1</td>
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</table>

19-016  
REVISE THE USAR TO REMOVE MAXIMUM FLOOD ELEVATION DESIGN LEVELS IN SECTION 1.2.1.7.1 AND REFER TO TABLES 2.4-16 AND 3.4-1 WHERE THIS INFORMATION IS ALSO LOCATED.

Page: 1.2-4

19-017  
REVISE THE USAR TO REFLECT THE TRANSITION OF RESPONSIBILITY FOR FIRE PROTECTION TRAINING TO THE MANAGER OPERATIONS. FIRE PROTECTION PERSONNEL NO LONGER REPORT TO ENGINEERING BUT RATHER TO THE MANAGER OPERATIONS DUE TO THE ALL OPERATIONS FIRE BRIGADE.


19-018  
REVISE THE USAR TO INCLUDE THE ADDITION OF THE NEW SECURITY MAIN ACCESS FACILITY, Z130. CHANGE PACKAGE 20062 ADDRESSES THE LOCATION, CONSTRUCTION AND TESTING OF THE NEW FACILITY. THE NEW ACCESS FACILITY INCLUDES A NEW SALLY PORT AND REQUIRED SECURITY FEATURES.

Page: 1.2-7 | Page: 9.5-8 | Page: 9.5-14 | Page: 9.5-40

19-019  
REVISE THE USAR TO DELETE THE NEED TO INSTALL A TEMPORARY JUMPER ON THE RESIDUAL HEAT REMOVAL ISOLATION VALVES ASSUMING A LOSS OF OFFSITE POWER WITH THE FAILURE OF ONE DIESEL GENERATOR. THIS IS BASED ON USAR SECTION 5.4.7.2.7 WHICH STATES THAT SINCE THIS FAILURE IS OF A MINOR NATURE, IMPROBABLE TO OCCUR AND EASILY CORRECTED OUTSIDE OF THE CONTROL ROOM.

Page: 7.4-8

19-020  
REVISE THE USAR TO REFLECT CHANGES TO CHAPTER 7 THAT WERE INADVERTENTLY LEFT OUT FROM USARCR 1993-018. PMR 3133/DCP 13324 REMOVED THOT AND TCOLD RCS INSTRUMENT LINES AND REPLACED THEM WITH THERMOWELL-MOUNTED RESISTANCE TEMPERATURE DETECTORS
(RTDS). CR 137989 IDENTIFIED THE OMISSIONS.

Table: 7.7-3 Sheet: 2 Table: 7.7-3 Sheet: 3
Table: 7.7-3 Sheet: 4 Table: 7.7-3 Sheet: 5
Table: 7.7-3 Sheet: 6 Table: 7.7-3 Sheet: 7
Table: 7.7-3 Sheet: 8 Table: 7.7-4 Sheet: 1
Table: 7.7-5 Sheet: 2 Table: 7.7-6 Sheet: 1

19-021 REVISE THE USAR TO REFLECT REACTOR PROTECTION SYSTEM INSTRUMENTATION CHANGES TO SUPPORT IMPLEMENTATION OF THE WESTINGHOUSE CORE DESIGN AND SAFETY ANALYSIS METHODOLOGY AT WOLF CREEK. SPECIFICALLY, THOT RANGE IS BEING CHANGED FROM 530-650F TO 540-660F. ALSO, THE RCS PRESSURE COEFFICIENT IN THE OTΔT INCLUDING THE RCS PRESSURE COEFFICIENT IN THE OTΔT EQUATION (K3 OR TRIP ACCURACY) IS BEING INCREASED FROM 0.000671 TO 0.00095/PSI. THIS CHANGE SUPPORTS THE USAR IMPLEMENTATION OF WOLF CREEK LICENSE AMENDMENT 221.

Table: 7.2-3 Sheet: 1

20-001 REVISE THE USAR TO REFLECT THAT THE PASS SYSTEM ASSOCIATED WITH THE HB AND LF SYSTEMS HAS BEEN ABANDONED IN PLACE (REF. WIP-M-12SJ04-012-A-1 REV). PENETRATION P-57 IS LEFT AS SPARE. USAR FIGURE 6.2.4-1, PG 4b, IS BEING DELETED FROM USAR.

Table: 6.2.4-1 Sheet: 2 Table: 18.2-2 Sheet: 3
Figure: 6.2.4-1 Sheet: 42b

20-002 REVISE USAR TO REFLECT CHANGE TO TABLE 6.2.2-2 (SHEET 3). CHANGE MATERIAL TYPE FOR TUBE TO "SB-676" AND MATERIAL TYPE FOR HEADER TO "SA-240 TP 316/316L."

Table: 6.2.2-2 Sheet: 3
REVISE THE USAR TO REFLECT A CHANGE TO WORDING USED IN USAR SECTION 8.3.1.1.2.c PG (8.3-3) "THE BUS TRANSFER IS PERFORMED APPROXIMATELY 33 SECONDS AFTER GENERATOR NON-VITAL TRIPS..." THE ISSUE IDENTIFIED IS THAT THE BUS TRANSFER HAPPENS AFTER APPROXIMATELY 33 SECONDS AFTER THE REVERSE POWER RELAY ACTUATES AND GENERATOR NON-VITAL TRIPS. THIS 33 SECOND DELAY FUNCTION IS CONFIRMED ON SCHEMATIC DIAGRAMS E-13MA10 AND E-13MA11A. THIS CHANGE ADDS A CLARIFICATION TO THE AFOREMENTIONED STATEMENT AND DOES NOT AFFECT ANY PLANT EQUIPMENT FUNCTIONS.
Attachment III to WO 20-0040

Revisions 66 through 68 to the Technical Requirements Manual
REVISIONS 66 THROUGH 68 TO THE TECHNICAL REQUIREMENTS MANUAL

1. Technical Requirements (TR) 3.7.17 and TR Bases 3.7.17 were revised to separately call out the spent fuel pool crane, auxiliary hoist, and cask handling crane monorail.

2. TR Bases 3.7.17 was also revised to identify that the new cask handling crane is designed as single failure proof, such that heavy loads travel restrictions are administratively controlled. The administrative control for the cask handling crane when it is unattended has been changed to disable the drives and make it incapable of movement. This change was made because the new cask handling crane (CHC) control system would have to be rebooted if the crane were completely deenergized. The spent fuel pool crane can still be deenergized when unattended.

3. TR 3.7.17 was revised to add a note that loads >2250 lbs. may be moved over the fuel assemblies in the spent fuel pool storage facility provided the load is being transported by the CHC main hook and the rigging and/or lifting devices are single failure proof in accordance with NUREG 0612.

4. TR Bases 3.7.17 was revised to clarify the use of administrative controls when interlocks/stops are defeated and when using the CHC main hoist. In addition, "auxiliary hoist" was clarified to mean any auxiliary hoist being used in the spent fuel pool storage facility.

5. TR Bases 3.4.17 was revised to remove excessive detail related to determining structural integrity of ASME Code Class 2 and 3 piping with flaws. The revision clarifies that for ASME Code Class 2 or 3 piping components with flaws (i.e., leaks), there are only several NRC-accepted methods for determining structural integrity is maintained. To use another method, the NRC would first have to review and approve that method. Determining structural integrity is required when determining OPERABILITY of ASME Code Class piping with leaks.

6. Table TR 5.2.1-1 was revised to reflect the changes to minimum shift crew composition approved in License Amendment 220. The number of Nuclear Station Operators (NSOs) was changed from 5 to 7; Chemistry personnel was changed from 2 to 1; Health Physics personnel was changed from 3 to 2; and the ENS Communicator and Offsite Communicator positions have been combined to create 1 new position titled Emergency Communicator.

7. Technical Surveillance Requirement (TSR) 3.7.21.1 was revised to clarify that this TSR excludes tritium sources and gaseous sources.
Quality Assurance Program Changes Since USAR Revision 21
QUALITY ASSURANCE PROGRAM CHANGES SINCE USAR REVISION 21

10 CFR 50.54, Condition of licenses, item (3) requires that changes to the Quality Assurance Program description that do not reduce the commitments to be submitted to the NRC in accordance with the requirements of 10 CFR 50.71(e), Maintenance of records, making of reports. For USAR Revisions 21 through 31 from March 2008 to March 2018, this requirement was not met. This condition was identified in Condition Report 114176. The following is a summary of changes to the Quality Assurance Program that did not reduce commitments.

1. Chapter 17.2 of the USAR, Quality Program Requirements, was removed from the USAR and placed into Revision 0, dated 1/25/2008, of the Wolf Creek Quality Program Manual (WCQPM) which is incorporated by reference in to the USAR. Chapter 17.2 was removed from the USAR under USAR Change Request 2008-001.

2. Revision to the WCQPM (Revision 1, dated 8/14/2008) to change the title of the Manager Quality and Performance Improvement to Manager Quality. The Performance Improvement group now reports to the Manager Corrective Action. The corrective action division will retain the responsibility of identifying trends and processing trend reports.

3. Revision to the WCQPM (Revision 2, dated 12/11/2008) describing Quality review of Special Processes for Quality Control and the ASME Repair Coordinator/Welding Engineer.

4. Revision to the WCQPM (Revision 3, dated 4/6/2009) describing the update of ASME Code Case from N-517 to N-517-1, change terminology from Performance Improvement Request (PIR) to Condition Report (CR), and requiring an independent review for more significant adverse conditions by an individual appointed by the Responsible Manager and who is not responsible for the corrective action plan or corrective action implementation. The revision also includes the allowance to close low risk condition reports documenting equipment issues to be closed to a work order.

5. Revision to the WCQPM (Revision 4, dated 7/21/2009) describing how the Work Request process is used to satisfy 10CFR50, Appendix B, Criterion XVI, for those items that are hardware issues and may not be adequately described in the WCQPM. This revision also re-instated the frequency of fire protection requirements for annual, biennial and triennial audits of fire protection. Revision 19 of the USAR reflected a change in the fire protection audit frequency from 12 to 24 months consistent with NRC Administrative Letter 95-06. Prior to this change, metrics were not established nor was past performance measured in order to demonstrate the acceptability of this change.

6. Revision to the WCQPM (Revision 5, dated 1/20/2010) to state Code Case N-517-1 requirements as the basis for WCNOC evaluations of qualified supplier’s quality assurance programs to ensure effective implementation. Additionally, a change was made on the acceptance of procured items and services based on two or more of written certifications, supplier audit or surveillance, source inspection, receiving inspection and testing or post-installation testing. Previously the requirement was one or more.
7. Revision to the WCQPM (Revision 6, dated 1/27/2010) to change the frequency of fire protection requirements for annual, biennial and triennial audits of fire protection into a biennial audit based on results of performance reviews and in allowance per NRC Administrative Letter 95-06.

8. Revision to the WCQPM (Revision 6A, dated 7/27/2010) to remove “Reference Use” classification from the cover sheet. This document is outside the procedure writers guide and uses only the procedure template.

9. Revision to the WCQPM (Revision 7, dated 8/25/2010) to reflect organizational title and reporting changes. Previous responsibilities of the Site Vice President are now the responsibility of the Vice President Operations.

10. Revision to the WCQPM (Revision 8, dated 10/1/2010) to align WCQPM requirements with specific verbiage and nomenclature to 10CFR50, Appendix B, ANSI N45.2.10 and Regulatory Issues Summary 2005-20, Revision 1, for Nonconformance and Corrective Action. Previously if a hardware problem was identified, then a work request was initiated. If a programmatic issue was also identified, then a condition report was also initiated. With incorporation of single point of entry into the corrective action program, a condition report is initiated for both hardware and programmatic issues.

11. Revision to the WCQPM (Revision 9, dated 4/19/2012) to incorporate the requirements of 10 CFR 72, Subpart G. These changes are being made to support the implementation of dry fuel storage activities and the establishment of an Independent Spent Fuel Storage Installation (ISFSI) at the Wolf Creek Generating Station under the requirements of and as described in 10 CFR 72. The requirement to establish a Quality Assurance Program to apply dry fuel storage activities at an ISFSI are described in 10 CFR 72.140(b), Establishment of Program (Quality Assurance Program). This change adds the commitment to apply the Wolf Creek Quality Program Manual to ISFSI related activities under 10 CFR 72. The changes are being made to the Quality Program Manual to ensure the requirements of 10 CFR 72.140(b) are being satisfied since WCNOC is planning the establishment of the ISFSI at Wolf Creek Generating Station under the requirements of 10 CFR 72.

12. Revision to the WCQPM (Revision 10, dated 9/8/2015) to incorporate the inclusion of specific Code Cases into the ASME B&PV Code. The third interval of the WCNOC ASME Section XI, ISI Program ends September 3, 2015. Per the Code of Federal Regulations, 10 CFR 50.55a effective 12 months prior to September 3, 2015, the 2007 Edition, 2008 Addenda of Section XI with conditions listed in 10 CFR 50.55a will become mandatory for Repair Replacement Activities for the 4th 10 Year Interval for ASME Class 1, 2 and 3 components. The ASME OM Code, 2004 Edition through 2006 Addenda will become the mandatory code for pump, valve and snubber testing during the 4th Interval. The WCQPM was revised to remove Code Cases N-517-1 and N-528-1 that have been incorporated into the ASME B&PV Code, Section XI, 2007 Edition 2008 Addenda.

13. Revision to the WCQPM (Revision 10A, dated 2/16/2016) to incorporate an administrative correction. The revision number was not updated from 9 to 10 on pages 83-89.
Attachment V to WO 20-0040

Report Consistent with 10 CFR 54.37(b) on How Effects of Aging of Newly-Identified Structures, Systems, or Components will be Managed
REPORT CONSISTENT WITH 10 CFR 54.37(b)
ON HOW EFFECTS OF AGING OF NEWLY-IDENTIFIED STRUCTURES, SYSTEMS, OR COMPONENTS WILL BE MANAGED.

This report is provided in lieu of adding a level of detail to the Wolf Creek Generating Station (WCGS) Updated Safety Analysis Report (USAR) that is greater in the remainder of the USAR, including the License Renewal Supplement contained in Chapter 18, Appendix A.

Regulatory Requirements and Guidance

10 CFR 54.37(b)

After the renewed license is issued, the FSAR update required by 10 CFR 50.71(e) must include any systems, structures, and components newly identified that would have been subject to an aging management review or evaluation of time-limited aging analysis (TLAA) in accordance with § 54.21. This FSAR update must describe how the effects of aging will be managed such that the intended function(s) in § 54.4(b) will be effectively maintained during the period of extended operation.

RIS 2007-16, Revision 1

Newly Identified Systems, Structures, and Components (SSCs)

The intent of 10 CFR 54.37(b) is to capture those SSCs that, if they had been identified at the time of the license renewal application, would have been subject to an aging management review or evaluation of TLAAs. In the context of 10 CFR 54.37(b), newly identified SSCs that should be included in the next FSAR update required by 10 CFR 50.71(e) are those SSCs that meet one of the two following conditions:

1. There is a change to the current licensing basis (CLB) that meets the following criteria:
   - The change impacts SSCs that were not in scope for license renewal when the NRC approved the license renewal application.
   - The SSCs would have been in the scope of license renewal based on the CLB change if 10 CFR 54.4(a) were applied to the SSCs.

2. SSCs were installed in the plant at the time of the license renewal review that, in accordance with the CLB at the time, should have been included in the scope of license renewal per 10 CFR 54.4(a) but were not identified as in scope until after issuance of the renewed license.

SSCs that are plant additions or modifications installed after the renewed license is issued are not subject to the provisions of 10 CFR 54.37(b).
Identification of SSCs under 10 CFR 54.37(b)

The language of 10 CFR 54.37(b) does not limit how or who finds newly identified SSCs. A licensee may identify SSCs that should be within the scope of its license renewal program at any time. The NRC staff may also discover newly identified SSCs. One way to identify these SSCs is through the License Renewal Interim Staff Guidance process.

Newly Identified SSCs

Using the guidance of RIS 2007-16, Revision 1, Wolf Creek Nuclear Operating Corporation (WCNOC) reviewed changes to the plant, to determine if any components installed in the plant at the time of approval of License Renewal were not previously evaluated for License Renewal applicability.

The WCGS 345 kV substation was upgraded for improved reliability. Change package (CP) 14155 reconfigured the 345 kV connection to switchyard transformer No. 7 to a breaker-and-a-half connection between breakers 345-80 and 345-90 which changed the Station Blackout (SBO) recovery path to XNB01. CP 14998 reconfigured the 345 kV connection to the startup transformer to a breaker-and-a-half connection between breakers 345-100 and 345-110 which changed the SBO recovery path to XNB02. These SBO recovery paths are different than the SBO recovery paths described NUREG-1915, Safety Evaluation Report Related to the License Renewal of Wolf Creek Generating Station Docket No. 50-482, Section 2.5.1.2.

The scoping boundary to Engineered Safety Features (ESF) transformer No. 2 is circuit breaker is 345-110 which connects the startup transformer to the 345 kV Waverly / La Cygne line. The scoping boundary to ESF transformer No. 1 is circuit breaker is 345-80 which connects transformer No. 7 to the 345 kV Benton line.

These change packages impact SSCs that were not in scope of license renewal when the NRC approved the WCGS license renewal application (LRA) and the SSCs would have been in scope of license renewal if 10 CFR 54.4(a) were applied to the SSCs. The newly identified structures or components are switchyard piers (concrete elements), transmission towers, high voltage insulators, switchyard bus and connections, and transmission conductors and connections.

The tables provided in the LRA are not being revised; however, the tables show the changes that would have been made had the newly identified components and structures been included in the LRA. The table numbers provided are in this attachment correlate with those provided in the LRA. The level of detail in this attachment is consistent with the level of detail provided in the LRA.
Table 3.5.2-10  Containments, Structures, and Component Supports – Summary of Aging Management Evaluation – Transmission Towers

<table>
<thead>
<tr>
<th>Component Type</th>
<th>Intended Function</th>
<th>Material</th>
<th>Environment</th>
<th>Aging Effect Requiring Management</th>
<th>Aging Management Program</th>
<th>NUREG-1801 Vol. 2 Item</th>
<th>Table 1 Item</th>
<th>Notes</th>
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<td>Concrete</td>
<td>Atmosphere/Weather (Structural) (Ext)</td>
<td>Cracking due to expansion</td>
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Table 3.5.2-10  Containments, Structures, and Component Supports – Summary of Aging Management Evaluation – Transmission Towers  
(Continued)  
Page 2 of 2

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* Added in LRA Amendment 5
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Enclosure I to WO 20-0040
CD-ROM Containing Updated Safety Analysis Report, Revision 33
Subject
Enclosed is the CD-ROM submittal of the Wolf Creek Generating Station Updated Safety Analysis Report, Revision 33.

Contact Name  Sheryl Sweet
Mailing Address  Wolf Creek Nuclear Operating Corporation
                P.O. Box 411
                Burlington, KS 66839
E-Mail Address  shsweet@wcnoc.com
Phone Number  620-364-8831 ext. 4682

Document Components:
The CD-ROM labeled "WCGS USAR, Rev.33" contains the following files:

- 001_USAR.pdf  250 KB
- 002_USARC01.pdf  1.3 MB
- 003_USARC02.0.pdf  70.2 MB
- 004_USARC02 Figures.pdf  52.9 MB
- 005_USARC03.pdf  68.2 MB
- 006_USARC04.pdf  11.2 MB
- 007_USARC05.pdf  5.6 MB
- 008_USARC06.pdf  26.1 MB
- 009_USARC07.pdf  3.5 MB
- 010_USARC08.pdf  5.5 MB
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- 015_USARC13.pdf  2.9 MB
- 016_USARC14.pdf  413 KB
- 017_USARC15.pdf  12.6 MB
- 018_USARC16.pdf  57 KB
- 019_USARC17.pdf  66 KB
- 020_USARC18.pdf  2.1 MB
- 021_USARNRCQ.pdf  387 KB
- 022_USAR Rev. 33-loep.pdf  461 KB
Enclosure II to WO 20-0040

CD-ROM Containing Updated Safety Analysis Report Controlled Figure Drawings
Subject
Enclosed is the CD-ROM submittal of the Wolf Creek Generating Station Updated Safety Analysis Report (WCGS USAR) controlled figure drawings that are considered incorporated by reference into the WCGS USAR.

Contact Name  Sheryl Sweet
Mailing Address  Wolf Creek Nuclear Operating Corporation
                P.O. Box 411
                Burlington, KS 66839
E-Mail Address  shsweet@wcnoc.com
Phone Number  620-364-8831 ext. 4682

Document Components:
The CD-ROM labeled "WCGS USAR, Rev.33 Controlled Figure Drawings" contains the following files:

- 001_Chapter 1.pdf  60.5 MB
- 002_Chapter 2.pdf  8.7 MB
- 003_Chapter 5.pdf  6.6 MB
- 004_Chapter 6.pdf  11.4 MB
- 005_Chapter 7.pdf  4.5 MB
- 006_Chapter 8.pdf  8.0 MB
- 007_Chapter 9.pdf  74.3 MB
- 009_Chapter 10.pdf  33.3 MB
- 009_Chapter 11.pdf  15.6 MB
- 010_Chapter 12.pdf  6.5 MB
- 011_Chapter 18.pdf  654 KB
Enclosure III to WO 20-0040

CD-ROM Containing Quality Program Manual and Fire Hazards Analysis
Subject
Enclosed is the CD-ROM submittal of the Wolf Creek Generating Station Wolf Creek Quality Program Manual (WCQPM) and Fire Hazards Analysis, both of which are considered incorporated by reference into the WCGS USAR.

Contact Name
Sheryl Sweet

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P.O. Box 411
Burlington, KS 66839

E-Mail Address
shsweet@wcnoc.com

Phone Number
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Document Components:
The CD-ROM labeled "WCGS USAR Fire Hazards Analysis and Quality Program Manual" contains the following files:

001_WCQPM Rev 10A.pdf 285 KB
002_E-1F9900 Rev 9.pdf 7.1 MB
003_E-1F9905 Rev 10.pdf 2.2 MB
004_E-1F9910 Rev 16.pdf 8.3 MB
005_E-1F9910-16-01.pdf 171 KB
006_E-1F9915 Rev 13.pdf 883 KB
007_XX-E-013 Rev 4.pdf 1.9 MB
008_XX-E-013 Rev 4_CN002.pdf 9.8 MB
009_XX-E-013 Rev 4_CN003.pdf 8.7 MB
010_XX-E-013 Rev 4_CN004.pdf 1.1 MB
011_XX-E-013 Rev 4_CN005.pdf 15.7 MB
012_M-663-00017A W08 1 to B6.pdf 94.8 MB
013_M-663-00017A W08 B7 to B13.pdf 93.6 MB
014_M-663-00017A W06 C to G3C.pdf 99.9 MB
015_M-663-00017A W06 G3D to H.pdf 74.7 MB
Enclosure IV to WO 20-0040

CD-ROM Containing EQSD-I, EQ Summary Document Section I Program Description, and EQSD-II, Equipment Qualification Summary Document Master List Section II
Subject
Enclosed is the CD-ROM submittal of the Wolf Creek Generating Station Wolf Creek EQSD-I, EQ Summary Document Section I Program Description, and EQSD-II, Equipment Qualification Summary Document Master List Section II, both of which are considered incorporated by reference into the WCGS USAR.

Contact Name Sheryl Sweet
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Burlington, KS 66839
E-Mail Address shsweet@wcnoc.com.com
Phone Number 620-364-8831 ext. 4682

Document Components:
The CD-ROM labeled "WCGS USAR Qualification Design Basis EQSD-I & EQSD-II" contains the following files:

001_EQSD-I Rev 14.pdf 8.5 MB
002_EQSD-II Rev 32.pdf 524 KB