



Stephen L. Smith  
Engineering Vice President

October 20, 2021  
ET 21-0015

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

- References:
- 1) Letter ET 21-0005, dated August 12, 2021, from S. L. Smith, WCNOG, to USNRC
  - 2) Letter dated September 23, 2021, from S. S. Lee, USNRC, to C. Reasoner, WCNOG
  - 3) Letter ET 21-0012, dated October 11, 2021, from S. L. Smith, WCNOG, to USNRC

Subject: Docket No. 50-482: Withdrawal of License Amendment Request for a Risk-Informed Resolution to GSI-191 (EPID L-2021-LLA-0152 and EPID L-2021-LLE-0039)

#### Commissioners and Staff:

Reference 1 provided a license amendment request (LAR) that proposed a risk-informed resolution to Generic Safety Issue (GSI)-191, "Assessment of Debris Accumulation on PWR Sump Performance," for the Wolf Creek Generating Station (WCGS). Additionally, Wolf Creek Nuclear Operating Corporation (WCNOG) requested an exemption from certain requirements in Section 50.46(a)(1) of Title 10 of the Code of Federal Regulations (10 CFR) in accordance with the provisions of 10 CFR 50.12, "Specific exemptions." During the acceptance review process, the Nuclear Regulatory Commission (NRC) staff identified that supplemental information was necessary to enable the NRC to assess the acceptability of the LAR for its detailed review. Reference 2 provided the request for supplemental information from the NRC.

In Reference 3, WCNOG provided the requested supplemental information. WCNOG identified that the risk evaluation done in support of this LAR was completed prior to WCNOG having final

fire PRA information beyond the scope of the WCGS Individual Plant Examination of External Events (IPEEE). WCNOG continues to develop a fire PRA model for use in future risk-informed applications and has planned a peer review of the fire PRA model to occur the week of November 1, 2021 with final peer review results expected early 2022.

Subsequently, WCNOG has decided to withdraw the LAR until the fire PRA model progresses to where a conclusive determination can be made on the acceptability of the request with respect to the criteria specified in Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decision on Plant-Specific Changes to the Licensing Basis." As such, WCNOG is hereby withdrawing its request for NRC review and approval of Reference 1. A new request may be submitted at a future date.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4093, or Ron Benham at (620) 364-4204.

Sincerely,



Stephen L. Smith

SLS/rt

cc: S. S. Lee (NRC)  
S. A. Morris (NRC)  
N. O'Keefe (NRC)  
K. S. Steves (KDHE)  
Senior Resident Inspector (NRC)