

Ron Benham Director Nuclear and Regulatory Affairs

> November 01, 2021 RA 21-0079

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

Subject: Docket No. 50-482 and 72-79: Revision of One Procedure and Two Forms that Implement the Radiological Emergency Response Plan (RERP) for Wolf Creek Generating Station (WCGS)

Commissioners and Staff:

In accordance with 10 CFR 50.54(q)(5), WCGS is submitting a change to the emergency plan. One Procedure and two forms that implement the WCGS RERP have been revised. The revised documents are identified below:

Procedures	Effective Dates	<u>Forms</u>	Effective Dates
AP 06-002, Rev. 22	October 7, 2021	APF 06-002-02, Rev. 1 APF 06-002-03, Rev. 1	October 7, 2021 October 7, 2021

The attached summary of the changes to the implementing procedures and the implementing forms explain that these changes do not reduce the effectiveness of the WCGS RERP.

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

Sincerely,

Ron Benham

Ron Benham

RDB/rlt

- Attachment: Summary of Changes to One Procedure and Two Forms that Implement the Radiological Emergency Response Plan (RERP) for Wolf Creek Generating Station (WCGS)
- cc: S. S. Lee (NRC), w/a

S. A. Morris (NRC), w/a G. E. Werner (NRC), w/a Senior Emergency Preparedness Inspector (NRC), w/a Senior Resident Inspector (NRC), w/a

Summary of Changes to One Procedure and Two Forms that Implement the Radiological Emergency Response Plan (RERP) for Wolf Creek Generating Station (WCGS)

1. Procedure, AP 06-002, "Radiological Emergency Response Plan (RERP)," Rev. 22

Under its NRC-issued general license, Wolf Creek Generating Station (WCGS) is adding an independent spent fuel storage installation (ISFSI) to the site. To reflect this addition the Radiological Emergency Response Plan (RERP) is being updated to reflect the new site features. Additionally, in Revision 21 of the RERP WCGS implemented an Integrated Public Alert Warning System (IPAWS) as the primary means for Alert and Notification System (ANS) and this change deletes an unused figure from the RERP which is no longer needed. SAP 98-154 and SAP 99-145 were added as references to support Alternate Source Term in Rev. 21A as steps 3.1.13 and 3.1.14. The new references were inadvertently duplicated as commitment steps. Steps 3.2.4 and 3.2.5 are being removed to correct the error.

The change does not reduce the effectiveness of the Emergency Plan.

2. Form, APF 06-002-02, "Emergency Action Levels Technical Bases," Rev. 1

Under its NRC-issued general license, WCGS is adding an ISFSI to the site for the dry storage of used fuel. To reflect this addition of an ISFSI to WCGS, the Emergency Action Levels (EALs) contained in APF 06-002-02 are being updated to add a new Initiating Condition IC/EAL (EU1.1) based on the NRC endorsed guidance provided in Revision 6 of NEI 99-01.

In addition, several other changes are being made to address variations of the EAL Technical Bases content. These additional changes provide clarification and consistency, but do not impact the understanding or performance of the affected steps.

The change does not reduce the effectiveness of the Emergency Plan.

3. Form, APF 06-002-03, "EAL Classification Matrix," Rev. 1

Under its NRC-issued general license, WCGS is adding an ISFSI to the site for the dry storage of used fuel. To reflect this addition of an ISFSI to WCGS, the EALs contained in APF 06-002-03, EAL CLASSIFICATION MATRIX are being updated to add a new EAL (EU1.1) based on the NRC endorsed guidance provided in Revision 6 of NEI 99-01.

In addition, several other administrative changes are being made to address variations of the matrix content to that provided in APF 06-002-02, EAL Technical Bases. These additional changes provide clarification and consistency, but do not impact the understanding or performance of the affected steps.

The change does not reduce the effectiveness of the Emergency Plan.