



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 20, 1999

File Center

50-482

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, KA 66839

SUBJECT: CLOSEOUT OF ACTIONS REGARDING GENERIC LETTER 98-04 ISSUED
JULY 14, 1998 FOR WOLF CREEK GENERATING STATION (TAC NO. MA4119)

Dear Mr. Maynard:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," to all holders of operating licenses or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs at operating nuclear power plant facilities.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility, including a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for (a) controlling the procurement of coatings and paints used at the facility, (b) the qualification testing of protective coatings, and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.
- (2) Information demonstrating compliance with item (i) or item (ii) below.
 - (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components (SSCs) during a postulated design basis loss-of-coolant accident (DB LOCA), the following information shall be provided to demonstrate compliance:

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- (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
 - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
 - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46(b)(5), long-term cooling and the functional capability of the safety-related containment spray system (CSS) as set forth in the facility's licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable.

The following information shall be provided: If a commercial-grade dedication program is not being used at the facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 11, 1998 (WM 98-0121) for Wolf Creek Generating Station (WCGS). In the letter, you stated that WCGS was licensed being committed to conform with Regulatory Guide 1.82, "Sumps for Emergency Core Cooling and Containment Spray Systems," Revision 0, however, at the time of licensing, there was no distinction made among the potential sources for post-LOCA debris (i.e., containment coatings versus other individual potential sources). Therefore, your response to the GL addressed the staff's questions under (1) and (2)(i) above.

The letter of November 11, 1998, provided the information requested by GL 98-04. Clarification was provided by your staff in an email on November 17, 1999, that basically all of the original coatings remain inside containment because there has been no major recoatings inside containment to date. There have been some localized areas which were touched-up and a few new supports that have been coated using your qualified coating program and, in the last outage, the small area of the internals lifting rig clevises were cleaned and recoated with a qualified coating. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for WCGS.

Mr. Otto L. Maynard

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This closes out our efforts on TAC No. MA4119. We thank you for your prompt and complete response. If you have any questions regarding this matter, please contact me at 301-415-1307, or through the internet at jnd@nrc.gov.

Sincerely,

/s/



Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-482

cc: See next page

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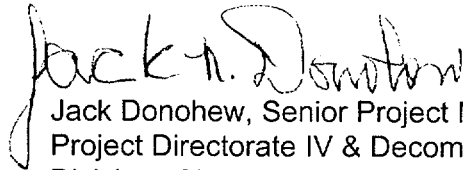
Mr. Otto L. Maynard

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December 20, 1999

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Sincerely,

A handwritten signature in black ink that reads "Jack N. Donohew". The signature is written in a cursive style with a large initial "J".

Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-482

cc: See next page

Wolf Creek Generating Station

cc:

Jay Silberg, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW
Washington, D.C. 20037

Vice President & Chief Operating Officer
Wolf Creek Nuclear Operating Corporation
P. O. Box 411
Burlington, Kansas 66839

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Superintendent Licensing
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, Kansas 66839

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 311
Burlington, Kansas 66839

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
8201 NRC Road
Steedman, Missouri 65077-1032

Chief Engineer
Utilities Division
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Office of the Governor
State of Kansas
Topeka, Kansas 66612

Attorney General
Judicial Center
301 S.W. 10th
2nd Floor
Topeka, Kansas 66612

County Clerk
Coffey County Courthouse
Burlington, Kansas 66839

Vick L. Cooper, Chief
Radiation Control Program
Kansas Department of Health
and Environment
Bureau of Air and Radiation
Forbes Field Building 283
Topeka, Kansas 66620