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ET 00-0022

U. S. Nuclear Regulatory Commission  
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Reference: Letter dated April 4, 2000, from J. N. Donohew, NRC, to O. L. Maynard, WCNOG

Subject: Docket No. 50-482: Clarification to Closeout Response to Generic Letter 96-05 — Wolf Creek Generating Station (TAC No. M97120)

Gentlemen:

This letter transmits information related to statements contained in the reference. Based on Wolf Creek Nuclear Operating Corporation's (WCNOG's) review of the information in the Reference, WCNOG is providing clarification.

The Reference cites letter ET 97-0009, dated March 17, 1997, as one of the four WCNOG submittals on Generic Letter 96-05. As a clarification, this cited letter should be ET 97-0024.

The Reference cited four commitments (1997-007, 1997-008, 1997-064 and 1998-036) to the JOG (Joint Owners Group) as establishing an acceptable program to periodically verify the design-basis capability of the safety related MOVs (Motor Operated Valves) at Wolf Creek Generating Station (WCGS).

The following provides the letter number, date, and commitment(s) from each letter, followed by a brief clarification of each commitment.

ET 96-0093	November 13, 1996	1997-007; 1997-008
ET 97-0024	March 17, 1997	1997-064
ET 98-0036	April 29, 1998	1998-036

Commitment 1997-007 states, "The current periodic verification program in use at WCNOG will be amended or enhanced, as necessary, to reflect the guidance of the generic letter." This statement is included in the programmatic means to fulfill Generic Letter 96-05, as stated more

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fully in commitment 1997-064. The JOG utilizes Generic Letter 96-05 as part of the "program elements;" therefore, commitment 1997-007 is superseded by commitment 1997-064 and is archived. The actions are met or included elsewhere, and commitment 1997-007 is no longer in effect.

Commitment 1997-008, to include verification program information in the 180-day response, is also an archived commitment. The commitment to provide information is completed, and is, therefore, no longer in effect.

WCNOC considers that commitments 1998-036 and 1997-064 provide adequate tracking to maintain "... an acceptable program to verify periodically the design-basis capability of the safety-related MOVs at Wolf Creek Generating Station," as stated in the Reference.

Commitment 1998-036 (erroneously documented in the Reference as 1998-03), states, "WCNOC is providing notification that it plans to continue participating in the [Joint Owners Group] JOG MOV Periodic Verification Program as a member of the Westinghouse Owners Group and to implement the program elements. . . ." This commitment is an ongoing commitment which notes the membership of the Westinghouse Owners Group (WOG), and briefly paraphrases and works with the more complete commitment, 1997-064.

Commitment 1997-064, an ongoing commitment excerpted from WCNOC letter ET 97-0024, will remain in effect:

- Select static diagnostic test results are trended to detect any changes in critical MOV performance characteristics. Trend results combined with other facts, such as operating conditions, stroke frequency and maintenance history are considered and may result in adjustments to static test frequencies, where appropriate.
- WCNOC will adopt the JOG MOV periodic verification program as a continued means of assuring preservation of design basis capability.
- Transition of the existing periodic verification program to the JOG periodic verification program at WCNOC will be accomplished upon completion and/or revision of program documents required to implement the JOG program.
- The specific implementation date will be dictated by completion of the site-specific [Probabilistic Safety Assessment] PSA ranking process of safety-related MOVs. The process will rank safety-related MOVs with respect to their relative importance to core damage frequency, including appropriate considerations regarding other consequences to be added by an expert panel.
- The existing periodic verification program as detailed earlier will continue to be applied to WCGS MOVs until such time that transition to the JOG periodic verification program is possible.
- WCNOC will continue to participate in the JOG program and will dynamically test the assigned valves and provide the test results to the JOG.
- Criteria established in accordance with the JOG periodic verification program will be used to select the MOV candidates.
- WCNOC will be responsible for the evaluation of dynamic test data obtained on-site in accordance with established procedures.

No additional commitments are contained in this correspondence. If you have any questions regarding this response, please contact me at (316) 364-4034, or Mr. Tony Harris, at (316) 364-4038.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. A. Muench', written in a cursive style.

Richard A. Muench

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cc: J. N. Donohew (NRC)  
W. D. Johnson (NRC)  
E. W. Merschoff (NRC)  
Senior Resident Inspector(NRC)