



Richard A. Muench
Vice President Technical Services

DEC 18 2001

ET 01-0036

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

Reference: 1. Letter ET 01-0008 dated April 3, 2001, from R. A. Muench, WCNOC, to USNRC

2. Letter ET 01-0030 dated October 22, 2001, from R. A. Muench, WCNOC, to USNRC

Subject: Docket No. 50-482: Supplemental Information for the Relocation of Technical Specification Cycle Specific Parameters to the Core Operating Limits Report

Gentlemen:

Reference 1 proposed changes to relocated Reactor Coolant System (RCS) related cycle-specific parameter limits from the Technical Specifications to the CORE OPERATING LIMITS REPORT (COLR). The justification to implement the expansion of the COLR is provided in Westinghouse WCAP-14483-A, "Generic Methodology for Expanding Core Operating Limits Report." The changes proposed in Reference 1 are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-339, Rev. 2. Reference 2 provided responses to questions identified in a telephone conference on September 14, 2001 with Mr. Jack Donohew, NRC Project Manager for the Wolf Creek Generating Station (WCGS).

On November 1, 2001, additional questions were electronically mailed to Wolf Creek Nuclear Operating Corporation (WCNOC) personnel. The responses to these questions were discussed in a meeting on November 15, 2001 between Mr. Jack Donohew, NRC, and Mr. Steve Wideman, WCNOC. It was requested that the responses be submitted to the NRC and are provided in Attachment I. Attachment II corrects an editorial error that was provided in Reference 1 and is further discussed in the response to Question 4.

Handwritten:
Aval
Rec'd
01/18/02

The supplemental information and correction to the proposed changes to the Technical Specifications do not impact the conclusions of the No Significant Hazards Consideration Determination provided in the Reference.

A copy of this correspondence, with attachments, is being provided to the designated Kansas State Official. If you should have any questions regarding this submittal, please contact me at (620) 364-4034, or Mr. Tony Harris at (620) 364-4038.

Very truly yours,

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

Richard A. Muench

RAM/rlr
Attachments

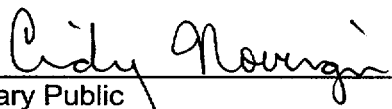
cc: V. L. Cooper (KDHE), w/a
J. N. Donohew (NRC), w/a
W. D. Johnson (NRC), w/a
E. W. Merschoff (NRC), w/a
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Richard A. Muench, of lawful age, being first duly sworn upon oath says that he is Vice President Technical Services 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 
Richard A. Muench
Vice President Technical Services

SUBSCRIBED and sworn to before me this 18th day of Dec. , 2001.


Notary Public



Expiration Date July 8, 2002

ATTACHMENT I
SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

Question:

1. Where is it stated in the application that the replacement safety limits for DNBR and peak fuel centerline temperature proposed for TS 2.1.1 are the valid safety limits for the plant?

Response:

The application (letter ET 01-0008 dated April 3, 2001) did not specifically provide the replacement safety limits for Departure from Nucleate Boiling Ratio (DNBR) and peak fuel centerline temperature as proposed for Technical Specification (TS) 2.1.1, "Reactor Core SLs."

The design limit DNBR is 1.23 for the WRB-2 Departure from Nucleate Boiling (DNB) correlation and 1.30 for the W-3 DNB correlation. The safety analysis DNBR limit of 1.76 incorporates a plant specific margin of 30.1%. Appendix A of the Wolf Creek Generating Station (WCGS) Cycle 12 CORE OPERATING LIMITS REPORT, Revision 0, specifies the design limit DNBR as approved in License Amendment No. 92. Updated Safety Analysis Report (USAR) Section 4.4.1.1, "Departure from Nucleate Boiling Design Basis," provides a discussion of the DNBR limits.

The peak fuel centerline temperature for WCGS is 5080 °F, decreasing by 58 °F per 10,000 MWD/MTU of burnup. USAR Section 4.2.1.2, "Fuel Material," provides a discussion of the peak centerline temperature.

Question:

2. For each of the references in Technical Specification (TS) 5.6.5.b that are proposed to be changed, provide a discussion of (1) what each Safety Evaluation (SE) was for (e.g., the SE was issued to Wolf Creek to approve a licensee topical report) and (2) the conditions, if any, that were specified by the NRC in approving the report.

Response:

As discussed with Mr. Jack Donohew, the conditions specified in the NRC approval for a specific topical report are not provided as part of this response. The response to Question 3 provides additional discussion concerning conditions specified in the NRC safety evaluations.

Question:

3. If the staff's SE above (in item 2) specified conditions on the use of the approved topical report, discuss if the conditions have been incorporated into the topical report so that listing the report in TS 5.6.5.b, in place of the current reference to the staff's SE, would require the licensee to continue to follow the conditions.

Response:

For Westinghouse topical reports (e.g., WCAP-11397-P-A), the NRC safety evaluation is incorporated into the topical report and reissued as an approved topical report. As such, any conditions specified in the NRC safety evaluation are included in the approved Westinghouse topical report. For the Wolf Creek Nuclear Operating Corporation (WCNOC) topical reports specified in TS 5.6.5b, the topical report is not reissued with the NRC safety evaluation

included. The Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-363, Revision 0, "Relocate Topical Report References in TS 5.6.5, COLR," revised the Reviewer's Note in the Standard Technical Specifications indicating that the CORE OPERATING LIMITS REPORT will contain the complete identification for each of the Technical Specification referenced topical reports used to prepare the CORE OPERATING LIMITS REPORT. WCNOG intends to include the reference topical reports as well a reference to the NRC safety evaluation or approval report. Additionally, incorporation of conditions specified in a NRC safety evaluation is typically addressed during the implementation process of a specified topical report.

Question:

4. For the proposed change to the first reference in TS 5.6.5.b, is the correct number of the WCNOG topical report the following, TR 90-0025 W01? The number proposed is the following: TR 00-0025 W01. The SE dated October 29, 1992, and the technical evaluation report attached to that SE stated TR 90-0025 W01. However, in the letter dated October 22, 2001, the response to Question 1 the topical report was stated to be TR 00-0025 W01.

Response:

The correct reference is TR 90-0025 W01. WCNOG letter ET 90-0140 dated August 21, 1990 transmitted the Core Thermal-Hydraulic Analysis Methodology topical report (TR 90-0025 W01) for NRC review. The NRC safety evaluation dated October 29, 1992 approved this topical report.

Letter ET 01-0008 dated April 3, 2001, provided the subject application for amendment. Page 10 in Attachment III to letter ET 01-0008 provided proposed changes to TS Section 5.6.5b. which included listing WCNOG Topical Report TR 00-0025 W01 as an analytical method approved by the NRC. Attachment II to this letter provides a revised TS page to correct this error and replaces Page 10 in Attachment III to letter ET 01-0008.

Question:

5. The staff requests that the licensee incorporate the changes to the COLR and to the TS Bases, that are specified in the licensee's application dated April 3, 2001, as part of the implementation of the amendment. Does the licensee agree to this being part of the implementation of the amendment.

Response:

The changes to the CORE OPERATING LIMITS REPORT and TS Bases are considered part of the implementation of the amendment and will be incorporated as part of implementation. WCNOG will adopt the TS Bases and CORE OPERATING LIMITS REPORT changes with the implementation of the license amendment.

Question:

6. The regulation 10 CFR 50.59 provides criteria for changes to the plant as described in the final safety analysis report without prior staff approval. In the licensee's response to Question 3 in the October 22, 2001, letter, it appears that the 50.59 criteria would be required to be applied to changes in the NRC-approved methodology documents listed in the COLR because such changes are part of the reload design activity, and the reload design activity is a change to the plant as specified in 10 CFR 50.59. Discuss if this is what was meant by the statement made in the response. If the 50.59 criteria is not required by 10 CFR 50.59 to be applied to changes in NRC-approved methodology documents in the COLR, then the staff requests that the licensee commit in its commitment tracking system to apply the 10 CFR 50.59 criteria to such changes. Provide the references in the USAR to the TS Section 5.6.5b. topical reports.

Response:

Reload activities are controlled through the design change process. The design change process includes 10 CFR 50.59 reviews. As such, reload activities would be required to be screened per 10 CFR 50.59 as they would be described in Chapter 15 of the USAR. (NOTE: "Described" is broad in application. The industry no longer relies on "changing" the SAR to initiate 50.59 reviews.) In addition, any changes to methods are required to have a 50.59 evaluation performed on the change based on Criteria 8 of 10 CFR 50.59. Therefore, there should be no need to make additional commitments to apply the 50.59 criteria to the NRC-approved methodology documents in the CORE OPERATING LIMITS REPORT but allow the 10 CFR 50.59 process to function as prescribed by the regulation and implementing guidance. This position is consistent with the discussions between the industry and the NRC that occurred during the development and implementation of recent changes to 10 CFR 50.59.

The below table provides the USAR references to TS Section 5.6.5b. topical reports and the applicable USAR section.

TOPICAL REPORT	USAR Ref./Section		USAR Section Discussion
TR 90-0025 W01	Ref. 93	4.4.7	4.4.2.2.3 4.4.2.9.5 4.4.4.3.1
NSAG-006	Ref. 8	5.2.6	5.2.2
WCAP-11397-P-A	Ref. 14	15.0.14	15.0.3.2
	Ref. 7	15.2.9	15.2.3.2
	Ref. 4	15.3.5	15.3.1.2
	Ref. 4	15.5.4	15.5.1.2
	Ref. 91	4.4.7	4.4.2.2.4, 4.4.2.12
WCAP-10216-P-A	Ref. 67	4.4.7	4.4.4.3.2
WCAP-10266-P-A	Ref. 6	15.6.7	15.6.5.3.1
WCAP-11596-P-A	Ref. 7	15.0.14	15.0.11.3
	Ref. 32	4.3.4	4.3.3.2

TOPICAL REPORT	USAR Ref./Section		USAR Section Discussion
WCAP-10965-P-A	Ref. 8	15.0.14	15.0.11.4
	Ref. 16	15.4.9	15.4.3.2.1
	Ref. 31	4.3.4	4.3.1.5, 4.3.2.4, 4.3.3.3
WCAP-12610-P-A	Ref. 2	4.1.1	4.1
	Ref. 20	4.2.5	4.2.1, 4.2.1.1, 4.2.1.4, 4.2.1.5, 4.2.3.1

Topical reports NSAG-007, "Reload Safety Evaluation Methodology for the Wolf Creek Generating Station," and WCAP-8745-P-A, "Design Bases for the Thermal Overpower ΔT and Thermal Overtemperature ΔT Trip Function," are not specifically referenced in the USAR.

ATTACHMENT II
TECHNICAL SPECIFICATION CORRECTION

LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Tony Harris, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4038.

COMMITMENT	Due Date/Event
The changes to the COLR and TS Bases are considered part of the implementation of the amendment and will be incorporated as part of implementation. WCNOC will adopt the TS Bases and COLR changes with the implementation of the license amendment.	License amendment implementation