

March 8, 2006

MEMORANDUM TO: David Terao, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Jack N. Donohew, Senior Project Manager **/RA/**
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: WOLF CREEK GENERATING STATION - RE: REACTOR COOLANT
SYSTEM (RCS) LEAKAGE DETECTION INSTRUMENTATION
METHODOLOGY (TAC NO. MC8214)

In its letter dated August 26, 2005 (Agencywide Documents Access Management System Accession No. ML052510236), Wolf Creek Nuclear Operating Corporation (the licensee) submitted a license amendment request (LAR) to change the Updated Safety Analysis Report (USAR) for Wolf Creek Generating Station (WCGS) to revise the methodology for the RCS leak detection instrumentation. The licensee stated that the revision would clarify the requirements of the containment atmosphere gaseous radioactivity monitor with regard to the RCS leak detection capability and justify that the monitor can be considered operable in compliance with Limiting Condition for Operation 3.4.15, in Technical Specification (TS) 3.4.15, "RCS Leakage Detection Instrumentation," during all applicable reactor modes. There are no proposed changes to the WCGS TSs. This LAR involves Regulatory Guide (RG) 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems," Revision 0, dated May 1973, which describes acceptable methods for RCS leakage detection systems.

The LAR explained that there two conditions under which the containment atmosphere gaseous radioactivity monitor would not adequately respond to RCS leakage with respect to the criteria in RG 1.45, but that there were conditions allowed by the TSs where the monitor would adequately respond.

In reviewing the above LAR, I determined that the proposed revision to USAR Table 5.2-6, which describes the licensee's compliance with the Nuclear Regulatory Commission RG 1.45, addressed only one of the two conditions when the containment atmosphere gaseous radioactivity monitor would not adequately respond to RCS leakage. The proposed revision to USAR Section 5.2.5.2.3 addressed both conditions. I requested that the licensee add a phrase from the revision to USAR Section 5.2.5.2.3 to the revision to USAR Table 5.2-6 so that the revision to the table would address both conditions. The licensee response is in the attached email from the licensee.

I also requested that the licensee address when, in its process to revise the USAR in response to the LAR being approved, any changes to the USAR revision would be controlled under the 10 CFR 50.59 process. The licensee response is in the attached email from the licensee.

The licensee's responses to my questions on the LAR provide additional clarifying information, do not expand the scope of the application as originally noticed, and do not change the staff's original proposed no significant hazards consideration determination for the LAR that was published in the *Federal Register* on October 25, 2005 (70 FR 61663).

Docket No. 50-482

Attachment: E-mail Dated March 2, 2006

The licensee's responses to my questions on the LAR provide additional clarifying information, do not expand the scope of the application as originally noticed, and do not change the staff's original proposed no significant hazards consideration determination for the LAR that was published in the *Federal Register* on October 25, 2005 (70 FR 61663).

Docket No. 50-482

Attachment: E-mail Dated March 2, 2006

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OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/LPL4/BC
NAME	JDonohew	LFeizollahi	DTerao
DATE	3/8/06	3/7/06	3/8/06

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E-MAIL DATED MARCH 2, 2006

From: "Hooper Diane M" <dihoope@WCNOC.com>
To: "Jack Donohew (E-mail)" <JND@nrc.gov>
Date: 3/2/06 2:07PM
Subject: FW: Follow up on Discussion on RCS Leakage Detection Instrumentation LAR (Ctmt Atmosphere Gaseous Radioac

Jack,

Please accept the following responses to your questions regarding the RCS Leakage Detection Instrumentation LAR. This email is a follow up email to one Steve Wideman provided earlier. These responses address a discussion on February 16, 2006 concerning the containment atmosphere gaseous radioactivity monitor. Participants on the telecon were: Jack Donohew (NRC), Brian Holderness (AmerenUE), and Steve Wideman (WCNOC). From this phone call there were two items that required follow up. These responses have been further modified to address additional comments received on February 21, 2006.

Thank you,
Diane Hooper
Supervisor Licensing
Wolf Creek Nuclear Operating Corporation
620-364-4041

1. Request to add additional wording to the proposed words on compliance with Position 5 in USAR Table 5.2-6 . The request was to add "and if elevated reactor coolant gaseous activity is present." to the end of the sentence stating: "For the containment gaseous radioactivity monitors reliable leak detection is possible, provided that the equilibrium activity of the containment atmosphere is below the level that would mask the change in activity corresponding to 1 gpm leak in one hour." WCNOC has reviewed the proposed additional wording and is in agreement to incorporate the wording.

2. Concerning the commitment to implement the proposed changes to the TS Bases and USAR within 90 days of NRC approval. For Wolf Creek, the proposed changes to the USAR are considered implemented with the internal approval of the USAR Change Request. Guidance exists that require the review of USAR Change Requests (via a USAR Change Request Database) during design reviews and other reviews. Once the USAR Change Request is approved internally, it is considered part of the USAR. As such, any additional changes would be subject to the 10 CFR 50.59 process.

If you have any additional questions, please let me or Steve know.

Contact information for Steve Wideman:
WCNOC Licensing
620-364-4037

CC: "Wideman Steven G" <stwidem@WCNOC.com>, "Dave Shafer (E-mail)" <dshafer@ameren.com>, "Brian Holderness (E-mail)" <bholderness@ameren.com>