



Terry J Garrett
Vice President, Engineering

February 21, 2006

ET 06-0012

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

Reference: Letter ET 05-0021, dated November 3, 2005, from T. J. Garrett, WCNOC, to the NRC

Subject: Docket Number 50-482: Supplement to Revision to Technical Specifications -- Steam Generator Tube Integrity Using the Consolidate Line Item Improvement Process

Gentlemen:

The Reference provided Wolf Creek Nuclear Operating Corporation's (WCNOC) application to revise the Technical Specification (TS) requirements related to steam generator tube integrity. The proposed change is based on NRC-approved Revision 4 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-449, "Steam Generator Tube Integrity."

On February 15, 2006, in discussions between the NRC Project Manager and WCNOC Licensing personnel, an additional change to TS 5.5.9, Section d. was identified. WCNOC letter ET 05-0001, dated April 18, 2005, submitted an amendment application requesting a one time change for Refueling Outage 14 and subsequent operating cycle to specify that the portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded from steam generator tube inspections. License Amendment No. 162, dated April 28, 2005, approved the one time change. The Reference incorporated in TS 5.5.9 the one time change approved by Amendment No. 162 as an alternate repair criteria. Additionally, a statement was added to the provisions for steam generator tube inspections (TS 5.5.9, Section d.) indicating that the portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded. However, this statement did not explicitly indicate that this provision was only for Refueling Outage 14 and the subsequent operating cycle. As such, TS 5.5.9, Section d., is being revised to state: "For Refueling Outage 14 and the subsequent operating cycle, the portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded." The revised TS page in Attachment I replaces Page 13 of 21 in Attachment II to ET 05-0021.

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Attachment I and II provide a Markup of Technical Specification Pages and Retyped Technical Specification pages.

The Plant Safety Review Committee has reviewed the additional information provided in this submittal. The additional information provided in the Attachments do not impact the conclusions of the No Significant Hazards Consideration provided in the Reference. In accordance with 10 CFR 50.91, a copy of this submittal is being provided to the designated Kansas State official.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4084, or Mr. Kevin Moles at (620) 364-4126.

Very truly yours,



Terry J. Garrett


TJG/rlt

Attachments: I - Markup of Technical Specification Pages
 II - Retyped Technical Specification Pages

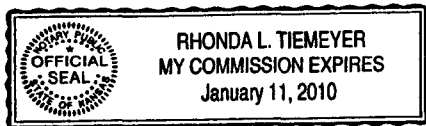
cc: T. A. Conley (KDHE), w/a
 J. N. Donohew (NRC), w/a
 W. B. Jones (NRC), w/a
 B. S. Mallett (NRC), w/a
 Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Terry J. Garrett, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering 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 
Terry J. Garrett
Vice President Engineering

SUBSCRIBED and sworn to before me this 21 day of Feb., 2006.



Rhonda L. Tiemeyer
Notary Public

Expiration Date January 11, 2010

ATTACHMENT I
MARKUP OF TECHNICAL SPECIFICATION PAGES

INSERT 5.5.9 (page 2 of 2)

1. For Refueling Outage 14 and the subsequent operating cycle, degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging.
- For Refueling Outage 14 and the subsequent operating cycle,
- d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. The portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.
 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
 2. Inspect 100% of the tubes at sequential periods of 120, 90, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 48 effective full power months or two refueling outages (whichever is less) without being inspected.
 3. If crack indications are found in any SG tube, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.
 - e. Provisions for monitoring operational primary to secondary LEAKAGE.

ATTACHMENT II
RETYPE TECHNICAL SPECIFICATION PAGES

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program

A Steam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the Steam Generator Program shall include the following provisions:

- a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.
- b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.
 1. Structural integrity performance criterion: All in-service steam generator tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down and all anticipated transients included in the design specification) and design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady state full power operation primary-to-secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary-to-secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.
 2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 1 gpm per SG.

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5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program (continued)

3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
- c. Provisions for SG tube repair criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.

The following alternate tube repair criteria may be applied as an alternative to the 40% depth-based criteria:

1. For Refueling Outage 14 and the subsequent operating cycle, degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging.
- d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. For Refueling Outage 14 and the subsequent operating cycle, the portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.
 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
 2. Inspect 100% of the tubes at sequential periods of 120, 90, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 48 effective full power months or two refueling outages (whichever is less) without being inspected.

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