WOLF CREEK
NUCLEAR OPERATING CORPORATION

Terry J. Garrett
Vice President, Engineering

September 22, 2006
ET 06-0040

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

Reference: 1) Letter WO 04-0030, dated July 23, 2004, from D. Jacobs, WCNOC, to USNRC

2) Letter ET 06-0028, dated August 11, 2006, from T. J. Garrett, WCNOC, to USNRC

Subject: Docket No. 50-482: Supplemental Information Related to License Amendment Request to Extend Containment Isolation Valve Completion Times

Gentlemen:

Reference 1 provided Wolf Creek Nuclear Operating Corporation's (WCNOC) application to revise Technical Specification (TS) 3.6.3, "Containment Isolation Valves," to extend the Completion Times for an inoperable containment isolation valve. The proposed changes are based on WCAP-15791-P, Revision 1, "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times." Reference 2 provided responses to a request for additional information (RAI) based on Nuclear Regulatory Commission (NRC) Staff review of the final safety evaluation dated March 10, 2006, on WCAP-15791-P, Revision 1, and Reference 1.

In WCNOC's response to RAI 6 in Reference 2, a regulatory commitment was made to revise the containment isolation fault tree model prior to utilization of the requested containment isolation valve Completion Time extensions by either: 1) modeling containment isolation valves for at least one of each WCAP-15791 penetration type applicable to Wolf Creek Generating Station (WCGS), including penetrations to the containment atmosphere greater than 2 inches in diameter or 2) modeling all containment isolation valves associated with this license amendment request, including penetrations to the atmosphere greater than 2 inches in diameter. On August 29, 2006, the NRC indicated by electronic mail that a condition of the technical branch safety evaluation was that the licensee initiate a peer review following the appropriate guidance once the upgrade to the WCGS Probabilistic Risk Assessment (PRA) model is completed. WCNOC responded by electronic mail on August 31, 2006, indicating that any peer review to be conducted would be a peer review of the changes to the containment

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isolation fault tree model, including addressing any Category A and Category B findings. The NRC Project Manager indicated that the peer review is being required for approval of the amendment and requested WCNOC to formally document the peer review as a regulatory commitment. On September 19, 2006 during a telephone call, the NRC Project Manager indicated that this commitment and the third commitment made in Reference 2 are required for the approval of the license amendment. As such, WCNOC is proposing additional license conditions to address this constraint. In doing so, WCNOC is revising the regulatory commitment provided in Reference 2 to be used as a license condition and include the completion of a peer review of the changes to the containment isolation fault tree model. In addition, the third commitment related to the issuance of a procedure to verify the valve position prior to performing maintenance is also being proposed as a license condition. Attachment II provides the proposed license conditions.

Reference 1 indicated the amendment would be implemented within 90 days of NRC approval. The regulatory commitment to revise the containment isolation fault tree model and completion of a peer review cannot be completed within 90 days. Therefore, once this amendment is approved, the amendment will be implemented prior to the start of Refueling Outage 16, which is scheduled to start in Spring 2008. (This is reflected as a regulatory commitment in Attachment I.) This implementation schedule is based on 1) resources necessary to support the Fall 2006 refueling outage, 2) resources necessary to revise the containment isolation fault tree model and address any Category A and B findings from the peer review, and 3) resources necessary to support currently scheduled projects during 2007.

The supplemental information provided in this submittal does not impact the conclusions of the No Significant Hazards Consideration provided in Reference 1. In accordance with 10 CFR 50.91, a copy of this submittal is being provided to the designated Kansas State official.

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

cc: T. A. Conley (KDHE)
J. N. Donohew (NRC), w/a
B. S. Mallett (NRC), w/a
G. E. Werner (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 22 day of Sept., 2006.

RHONDA L. TIEMEYER
NOTARY PUBLIC
OFFICIAL SEAL
MY COMMISSION EXPIRES
January 11, 2010

Rhonda L. Tiemeyer
Notary Public

Expiration Date January 11, 2010

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by 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. Kevin Moles at (620) 364-4126.

COMMITMENT	Due Date/Event
Once this amendment is approved, the amendment will be implemented prior to the start of Refueling Outage 16, which is scheduled to start in Spring 2008.	Prior to the start of Refueling Outage 16

LIST OF PROPOSED LICENSE CONDITIONS

Amendment Number	Additional Condition	Implementation Date
167	WCNOC will revise the WCGS containment isolation fault tree model prior to utilization of the requested containment isolation valve Completion Time extensions by either: 1) modeling containment isolation valves for at least one of each WCAP-15791 penetration type applicable to WCGS, including penetrations to the containment atmosphere greater than 2 inches in diameter or 2) modeling all containment isolation valves associated with this license amendment request, including penetrations to the containment atmosphere greater than 2 inches in diameter. A peer review of the changes to the containment isolation fault tree model, including addressing Category A and Category B findings, will be completed following revision to the containment isolation fault tree model.	Prior to the start of Refueling Outage 16
167	Prior to implementation of the amendment WCNOC will implement in its procedures the requirement to confirm that the remaining containment isolation valve(s) in the affected penetration(s) are in their correct position(s) prior to performing maintenance on a containment isolation valve.	Prior to the start of Refueling Outage 16