



Cleveland O. Reasoner  
Vice President Engineering

August 21, 2014

ET 14-0025

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

- References:
- 1) Letter dated March 12, 2012, from E. J. Leeds and M. R. Johnson, USNRC, to M. W. Sunseri, WCNOC, "Issuance of Order to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation"
  - 2) NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012
  - 3) NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"," Revision 1, dated August 2012
  - 4) Letter ET 12-0028, dated October 29, 2012, from J. P. Broschak, WCNOC, to USNRC
  - 5) Letter WO 13-0015, dated February 28, 2013, from R. A. Smith, WCNOC, to USNRC
  - 6) Letter ET 13-0026, dated August 28, 2013, from J. P. Broschak, WCNOC, to USNRC
  - 7) Letter ET 14-0010, dated February 26, 2014, from J. P. Broschak, WCNOC, to USNRC

Subject: Docket No. 50-482: Wolf Creek Nuclear Operating Corporation's Third Six-Month Status Report for the Implementation of Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"

Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 (Reference 1) to Wolf Creek Nuclear Operating Corporation (WCNOC). Reference 1 was immediately effective and directs WCNOC to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

ADD!  
NRR

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an Overall Integrated Plan (OIP) pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document Nuclear Energy Institute (NEI) 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2.

Reference 4 provided the WCNOIC initial status report regarding mitigation strategies. Reference 5 provided the WCNOIC OIP. References 6 and 7 provided the first and second six-month status report for the implementation of Order EA-12-051, respectively.

Reference 1 requires submission of a status report at six-month intervals following submittal of the OIP. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the third six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the submittal of Reference 7, including changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4171, or Mr. Steven R. Koenig at (620) 364-4041.

Sincerely,

A handwritten signature in black ink, appearing to read "Cleveland O. Reasoner", written in a cursive style.

Cleveland O. Reasoner

COR/rlt

Attachment

cc: M. L. Dapas (NRC), w/a  
C. F. Lyon (NRC), w/a  
N. F. O'Keefe (NRC), w/a  
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS     )  
                                  ) SS  
COUNTY OF COFFEY    )

Cleveland O. Reasoner, 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 *Cleveland O. Reasoner*  
Cleveland O. Reasoner  
Vice President Engineering

SUBSCRIBED and sworn to before me this 21<sup>st</sup> day of August, 2014.



*Gayle Shephard*  
Notary Public

Expiration Date 7/24/2015

**Wolf Creek Nuclear Operating Corporation's Third Six-Month Status Report for the  
Implementation of Order EA-12-051, "Issuance of Order to Modify Licenses with Regard  
to Requirements for Reliable Spent Fuel Pool Instrumentation"**

**1. Introduction**

Wolf Creek Nuclear Operating Corporation (WCNOC) developed an Overall Integrated Plan (OIP) (Reference 1), documenting the modification with regard to Reliable Spent Fuel Pool (SFP) Instrumentation in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the second six-month status report, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

**2. Milestone Accomplishments**

Westinghouse has completed the generic design of the SFP Instrumentation System and WCNOC has received the SFP level instruments on site. WCNOC is working to complete the final design change package to support final installation.

**3. Milestone Schedule Status**

There are no changes to the status of the milestones submitted in the OIP (Reference 1). Provided is the activity status of each item, and whether the expected completion date has changed. The dates are planning dates and are subject to change as design and implementation details are developed.

*Italicized text denotes that a Milestone was updated since the second six-month status update.*

<b>Milestone</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
Commence Engineering and Design	1Q2013	Complete	-
Complete Generic Design	4Q2013	Complete	-
<b>Submit 6 Month Updates:</b>			
Update 1	Aug 2013	Complete	-
Update 2	Feb 2014	Complete	-
<i>Update 3</i>	<i>Aug 2014</i>	<i>Complete</i>	-
Update 4	Feb 2015	Not Started	-
<i>Receipt of SFP Instruments</i>	<i>3Q2014</i>	<i>Complete</i>	-
<i>Complete Site Specific Design</i>	<i>3Q2014</i>	<i>Started</i>	-
Complete SFP Instrumentation Procedures & Training	4Q2014	Not Started	-
SFP Instruments Operational	1Q2015	Not Started	-

**4. Changes to Compliance Method**

No changes to the compliance method have been made since the previous update (Reference 3).

**5. Need for Relief/Relaxation and Basis for the Relief/Relaxation**

WCNOC expects to comply with the order implementation date and no relief/relaxation is required at this time.

**6. Open Request for Additional Information (RAI)**

Subsequently, the NRC issued an Interim Staff Evaluation and RAI (Reference 4) on October 29, 2013. Reference 5 announced the transition to an audit based review process, and notified each licensee participating in the audit not to formally submit their RAI responses on the docket but instead, put their responses and any other supporting information on their ePortals by the date identified in their Interim Staff Evaluations to support the staff's review process. WCNOC supports the use of the audit process for responding to the staff's questions pertaining to Order EA-12-051.

**References**

1. WCNOC Letter WO 13-0015, "Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements For Reliable Spent Fuel Pool Instrumentation," February 28, 2013. ADAMS Accession No. ML13071A419.
2. Letter from E. J. Leeds and M. R. Johnson, USNRC, to M. W. Sunseri, WCNOC, "Issuance of Order to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation," March 12, 2012. ADAMS Accession No. ML12056A044.
3. WCNOC Letter ET 14-0010, "Wolf Creek Nuclear Operating Corporation's Second Six Month Status Report for the Implementation of Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," February 26, 2014. ADAMS Accession No. ML14064A184.
4. Letter from C. F. Lyon, USNRC, to M. W. Sunseri, WCNOC, "Wolf Creek Generating Station – Interim Staff Evaluation and Request for Additional Information Regarding Overall Integrated Plan in Response to Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0781)," October 29, 2013. ADAMS Accession No. ML13295A681.
5. Letter from J. R. Davis, USNRC, to A. C. Heflin, WCNOC, "Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051," March 26, 2014. ADAMS Accession No. ML14083A620.