WOLF CREEK
NUCLEAR OPERATING CORPORATION

Cleveland Reasoner
Site Vice President

July 15, 2015
WO 15-0044

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

Reference: 1) Letter ET 14-0008, dated February 26, 2014, from J. P. Broschak, WCNOC, to USNRC

2) Letter ET 14-0038, dated December 8, 2014, from J. H. McCoy, WCNOC, to USNRC

3) Electronic mail dated June 18, 2015, from C. F. Lyon, USNRC, to S. G. Wideman, WCNOC

Subject: Docket No. 50-482: Proposed License Condition Regarding License Amendment Request for Revision to Technical Specification 5.6.5 for Large Break Loss-of-Coolant Accident (LOCA) Analysis Methodology

Gentlemen:

Reference 1 provided the Wolf Creek Nuclear Operating Corporation (WCNOC) application to revise the Wolf Creek Generating Station (WCGS) Technical Specifications (TS). Specification 5.6.5, "CORE OPERATING LIMITS REPORT (COLR)," is revised to incorporate WCAP-16009-P-A, "Realistic Large-Break LOCA Evaluation Methodology Using the Automated Statistical Treatment of Uncertainty Method (ASTRUM)," to the list of analytical methods used to determine the core operating limits. The Reference 1 application was a plant specific best-estimate large break LOCA analysis that accounted for the effects of fuel thermal conductivity degradation (TCD).

Reference 2 provided a regulatory commitment to submit a schedule for performing a large break LOCA re-analysis that applies a Nuclear Regulatory Commission (NRC) approved methodology, which includes the effects of fuel thermal conductivity degradation, within 6 months of NRC approval of WCAP-16996-P, "Realistic LOCA Evaluation Methodology Applied to the Full Spectrum of Break Size (FULL SPECTRUM LOCA Methodology)," and WCAP-17642-P, "Westinghouse Performance Analysis and Design Model (PAD5)."

A001
NRR

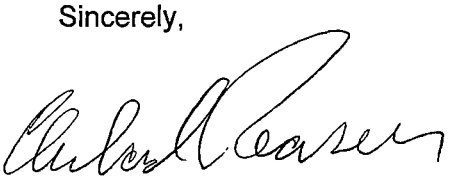
In Reference 3, the NRC indicated that a license condition was required for the approval of Reference 1 as it is dependent of eventual use of an approved methodology in accordance with 10 CFR 50.46. The Attachment provides the proposed license condition to Appendix D of the renewed facility operating license.

The proposed license condition does not expand the scope of the application and does not impact the no significant hazards consideration determination presented in Reference 1. The proposed license condition was reviewed by the Plant Safety Review Committee.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," 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) 364-4171, or Mr. Steven R. Koenig at (620) 364-4041.

Sincerely,



Cleveland Reasoner

COR/rlt

Attachment

cc: T. A. Conley (KDHE), w/a
M. L. Dapas (NRC), w/a
C. F. Lyon (NRC), w/a
A. A. Rosebrook (NRC), w/a
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) **SS**
COUNTY OF COFFEY)

Cleveland Reasoner, of lawful age, being first duly sworn upon oath says that he is Site Vice President 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 Reasoner
Cleveland Reasoner
Site Vice President

SUBSCRIBED and sworn to before me this 15th day of July, 2015.

STATE OF KANSAS NOTARY PUBLIC
RHONDA L. TIEMEYER
My Appointment Expires
January 11, 2018

Rhonda L. Tiemeyer
Notary Public

Expiration Date January 11, 2018

ATTACHMENT
PROPOSED LICENSE CONDITION

Amendment Number		Additional Condition	Implementation Date
179 (Cont'd)	(b)	The first performance of the periodic assessment of CRE habitability, Specification 5.5.18c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from August 16, 2004, the date of the most recent successful tracer gas test, as stated in the November 16, 2004, letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.	
	(c)	The first performance of the periodic measurement of control room pressure, Specification 5.5.18.d, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from February 2, 2007, the date of the most recent successful pressure measurement test.	
XXX		Automated Statistical Treatment of Uncertainty Method (ASTRUM), as corrected for thermal conductivity degradation (TCD) including the use of PAD 4.0 + TCD, has specifically been approved for use in the WCGS licensing basis analyses. Upon NRC approval of a revised generic best-estimate loss-of-coolant accident (LOCA) analysis methodology and fuel performance analysis methodology that accounts for TCD and is applicable to the fuel in use at WCGS, WCNOC will within 6 months, either:	Within 6 months of NRC approval of a revised methodology that accounts for TCD
	(a)	Demonstrate that the WCGS safety analyses remain conservatively bounded in licensing basis analyses when compared to the new generically approved version of the LOCA analysis methodology and fuel performance analysis methodology that accounts for TCD, or	
	(b)	Provide a schedule for re-analysis of any of the affected licensing basis analyses using the new generically approved version of the LOCA analysis methodology and fuel performance analysis methodology that accounts for TCD.	