



Jaime H. McCoy
Site Vice President

August 9, 2018

WO 18-0034

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

- References:
- 1) Letter ET 17-0001, dated January 17, 2017, from J. H. McCoy, WCNOG, to USNRC
 - 2) Electronic mail dated September 21, 2017, from B. K. Singal, USNRC, to W. T. Mulenburg, WCNOG, "Request for Additional Information - License Amendment Request for Transition to Westinghouse Core Design and Safety Analyses Including Adoption of Alternative Source Term (CAC No. MF9307)"
 - 3) Letter ET 17-0024, dated October 18, 2017, from J. H. McCoy, WCNOG, to USNRC
 - 4) Letter ET 18-0018, dated June 19, 2018, from J. H. McCoy, WCNOG, to USNRC

Subject: Docket No. 50-482: Additional Supplement to License Amendment Request to Revise Technical Specifications to Transition to Westinghouse Core Design and Safety Analysis Including Adoption of Alternative Source Term

To Whom It May Concern:

Reference 1 provided the Wolf Creek Nuclear Operating Corporation (WCNOG) application to revise the Wolf Creek Generating Station (WCGS) Technical Specifications (TS). The proposed amendment would support transition to the Westinghouse Core Design and Safety Analysis methodologies. In addition, the amendment request included methodology in accordance with 10 CFR 50.67, "Accident Source Term." Reference 2 provided a request for additional information (RAI) related to the application. Reference 3 provided the responses to the RAI contained in Reference 2. Reference 4 subsequently provided a supplemental response to one of the responses provided. Via teleconference held on June 28, 2018, the NRC requested clarification for the supplemental response provided. This attachment to this letter provides that clarification. The information provided in the attachment is non-proprietary.

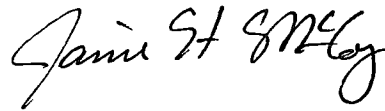
ADD
NRR

The additional information does not expand the scope of the application and does not impact the no significant hazards consideration determination presented in Reference 1.

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) 364-4156, or Cynthia R. Hafenstine at (620) 364-4204.

Sincerely,

A handwritten signature in black ink, appearing to read "Jaime H. McCoy". The signature is fluid and cursive, with the first name "Jaime" being more prominent.

Jaime H. McCoy

JHM/

Attachment: Additional Supplemental Response to Request for Additional Information

cc: K. M. Kennedy (NRC), w/a
B. K. Singal (NRC), w/a
K. S. Steves (KDHE), w/a
N. H. Taylor (NRC), w/a
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Jaime H. McCoy, 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 Jaime H. McCoy
Jaime H. McCoy
Site Vice President

SUBSCRIBED and sworn to before me this 9th day of August, 2018.



Gayle Shepherd
Notary Public

Expiration Date 7/24/2019

Additional Supplemental Response to Request for Additional Information

During the final peer review of the RAI responses provided to the Nuclear Performance and Code Branch, an additional concern was identified with the Question 2 response provided in Letter ET 17-0024. During subsequent clarification calls, further information related to this concern was requested. The requested information is provided below.

NRC ADAMS Accession No. ML17265A014 Question 2

Please provide further justification for the gap fractions assumed in the fuel handling accident analysis. The justification should provide an analysis using NRC-approved methodologies and a power history that bounds limiting plant-specific power histories at Wolf Creek, per RG 1.183, Footnote 11.

Supplemental Response:

(Provided in WCNOG Letter ET 18-0018, dated June 19, 2018, ADAMS Accession No. ML18177A198)

A clarification call was held on May 29, 2018 to discuss an additional concern that arose during the final peer review of the scope tied to the gap fractions. The concern is regarding limitations on the quantity of fuel that may exceed the RG 1.183, Table 3, Footnote 11 conditions.

As described in the original response, typical Wolf Creek core designs show no exceedances of the Footnote 11 applicability limits. However, there is the possibility that an atypical core design (e.g. Cycle 23) could result in a limited number of rods (much less than 10%) exceeding the Footnote 11 applicability limits. Thus, an upper limit of 10% will be validated on a cycle-by-cycle basis as part of the reload safety analysis checklist.

Additional Supplemental Response:

A clarification call was held on June 28, 2018 to further discuss an additional concern that arose during the final peer review of the scope tied to the gap fractions. The concern is regarding the linear heat rate and burnup limitations on the quantity of fuel that may exceed the RG 1.183 Table 3, Footnote 11 conditions.

As described in the supplemental response, an upper limit for rods exceeding the Footnote 11 applicability limits of 10% will be validated on a cycle-by-cycle basis as part of the reload safety analysis checklist. The linear heat rates and burnups of that 10% will be within the PNNL-18212, Rev. 1, Table 2.9 gap fraction applicability limits (12.2 kw/ft up to 35 GWD/MTU, decreasing to 7.0 kw/ft at 65 GWD/MTU). This will also be validated on a cycle-by-cycle basis as part of the reload safety analysis checklist.

Additionally, it is noted that the previous responses misstated the PNNL-18212, Revision 1 document number as PNNL-1221, Revision 1.