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Eugene Imbro
58FR15885
3/24/93

WOLF CREEK
NUCLEAR OPERATING CORPORATION

Forrest T. Rhodes
Vice President Engineering

April 23, 1993
ET 93-0055

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OFFICE OF ADMINISTRATION
USNRC

Chief, Rules and Directives Review Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Reference: Letter dated April 2, 1993 from W. H. Rasin, NUMARC
to D. L. Meyer, NRC
Subject: Comments on NRC Draft Generic Letter, "Availability
and Adequacy of Design Bases Information"

Gentlemen:

This letter provides Wolf Creek Nuclear Operating Corporation's (WCNOC) comments on NRC draft generic letter, "Availability and Adequacy of Design Bases Information" as published in the Federal Register dated March 24, 1993 (58FR15885). The reference provided comments from NUMARC to the NRC on this draft generic letter. WCNOC concurs with NUMARC's comments and provides the following additional comments.

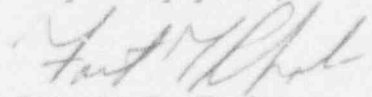
First, existing inspection activities should be sufficient to determine the adequacy of a licensee's design bases. Examples of current NRC inspection modules which examine design bases activities include the Electrical Distribution System Function Inspection (Temporary Inspection Module 2515/107) and Engineering and Technical Support Inspection (Inspection Module 37700).

This leads to the second comment. WCNOC has previously provided the information being requested by the proposed generic letter to the NRC. This information has been provided both through the inspection activities mentioned above and through licensee requested meetings with the NRC. WCNOC feels this type of information exchange should be promoted. Therefore, WCNOC believes that issuance of a generic letter should not be necessary.

The final comment is concerning the use of the terminology, design bases reconstitution. Reconstitution of design bases may not be necessary for all licensees. The design bases for WCNOC have been sufficiently maintained. Therefore, design bases activities at WCNOC have focused on a systematic organization of design bases information to facilitate retrieval and maintenance.

If you have any questions concerning this matter, please contact me at (316) 364-8831 extension 4002 or Mr. Kevin J. Moles at extension 4565.

Very truly yours,



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Vice President Engineering

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FTR/jan

cc: W. D. Johnson (NRC)
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