

WOLF CREEK

NUCLEAR OPERATING CORPORATION

April 28, 1993

Forrest T. Rhodes
Vice President Engineering

ET 93-0054

U. S. Nuclear Regulatory Commission
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Reference: 1) Letter ET 90-0190 dated December 21, 1990 from
F. T. Rhodes, WCNOC, to NRC
2) Letter ET 91-0075 dated May 14, 1991 from
F. T. Rhodes, WCNOC, to NRC
3) Letter dated July 30, 1992 from W. D. Reckley, NRC
to B. D. Withers, WCNOC
4) Letter WM 92-0158 dated October 2, 1992 from
B. D. Withers, WCNOC, to NRC
Subject: Docket No. 50-482: Change in Commitment Made in
Response to Generic Letter 90-06

Gentlemen:

This letter provides notification of a change in commitment made by Wolf Creek Nuclear Operating Corporation (WCNOC) as part of the response to the NRC's request for additional information on WCNOC's Generic Letter 90-06 submittal. This change involves testing the power-operated relief valves (PORV's) during Mode 4 prior to Mode 3 (ascending) every time the plant is placed in Mode 5 for greater than 72 hours, not to exceed quarterly testing. This change was discussed between Mr. Steven G. Wideman, Supervisor Licensing, and others from WCNOC, and Mr. William D. Reckley, NRC Project Manager, and others from the NRC on a conference call on April 8, 1993. Additionally, the discussion determined that a supplement to the license amendment request would not be required.

Generic Letter (GL) 90-06, dated June 25, 1990 was issued to present NRC staff positions on Generic Issue 70 (GI-70), "Power-Operated Relief Valve and Block Valve Reliability," and Generic Issue 94 (GI-94), "Additional Low-Temperature Overpressure Protection for Light-Water Reactors." WCNOC's original response to GL 90-06 (Reference 1) stated, for item 2 of the GI-70 issue, that "The PORV's and block valves are included in the NRC approved Inservice Testing (IST) program. The PORV's are full stroke tested on a cold shutdown frequency with the block valve open in accordance with the IST program and WCGS Technical Specifications." A separate Technical Specification 3/4.4.4, Relief Valves and 3.4.9.3, Overpressure Protection System, change was submitted on May 14, 1991 (Reference 2) to complete WCNOC's response to GL 90-06.

The NRC notified WCNOC on July 30, 1992 (Reference 3) that selected portions of Reference 1 were not acceptable and that a resubmittal would be required to provide a response that met the intent of the GL. Specifically the NRC stated that "The staff is not accepting Mode 5 (COLD SHUTDOWN) testing simply because it is allowable by the ASME Code or that the NRC approved IST program includes Mode 5 for this particular test."

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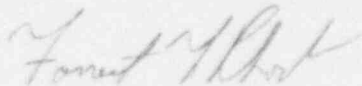
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WCNOC provided the required resubmittal on October 2, 1992 (Reference 4) which modified Reference 1 to state that WCNOC will full stroke test the PORV's prior to cooldown below 368°F. This surveillance test would be conducted during Mode 3 operation, consistent with the staff's position to ensure PORV operability for purposes of low temperature overpressure protection. WCNOC also committed in this submittal to supplement the license amendment request to Technical Specifications 3/4.4.4 and 3.4.9.3 to reflect the changes made to the response to item 2 by April 30, 1993.

WCNOC has performed additional reviews of the responses to this GL and the current testing methodology for the PORV's. Based upon this review, WCNOC intends to full stroke test the PORV's during Mode 4 prior to Mode 3 (ascending) every time the plant is placed in Mode 5 for greater than 72 hours, not to exceed quarterly testing. This testing will be performed in Mode 4 ascending to avoid testing following shutdown when decay heat load is the greatest. This surveillance testing, which demonstrates the operability of the PORV's, remains valid for up to 18 months and maintains the valves as operable prior to establishing conditions where the PORV's are used for low temperature overpressure protection. WCNOC intends to perform this testing in this manner while returning to Power Operation from the current refueling outage. During the period from the original response to the present, testing of the PORV's was performed in accordance with WCNOC's GL response and commitments in affect at the time. Based upon the discussions with the NRC staff, testing of the PORV's in this manner meets the intent of the GL.

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

Very truly yours,



Forrest T. Rhodes
Vice President Engineering

FTR/jad

cc: W. D. Johnson (NRC)
J. L. Milhoan (NRC)
G. A. Pick (NRC)
W. D. Reckley (NRC)