

DOCKET NUMBER PR 50
MAINTENANCE RULE

(58 FR 15303)

WOLF CREEK

NUCLEAR OPERATING CORPORATION

RECEIVED
GENERAL

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Bart D. Withers
President and
Chief Executive Officer

April 30, 1993
WM 93-0061

Secretary, U. S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, D. C. 20555

Reference: Federal Register Notice, 58 FR 15303, dated March 22, 1993
Subject: Docket No. 50-482: Comments on Proposed Revision to 10 CFR 50.65(a)(3), the Maintenance Rule

Gentlemen:

As noted in the reference Federal Register Notice, the proposed revision to 10 CFR 50.65(a)(3), issued March 22, 1993 for public comment, would change the frequency to evaluate the effectiveness of maintenance activities from annually to once every refueling outage but not to exceed 24 months. Wolf Creek Nuclear Operating Corporation (WCNOC) fully supports the position of the Nuclear Management Resources Council (NUMARC) that the change would be appropriate since significantly more data is available during refueling outages, key data from some surveillance tests can only be obtained during refueling outages, and adjustments to maintenance activities that may be made are typically performed after a refueling outage. Also, the proposed change would be consistent with the frequency of the submittal of the Updated Safety Analysis Report (USAR) which was changed in August 1992 from annually to once per refueling cycle, not to exceed 24 months.

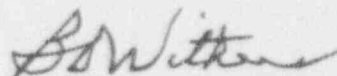
WCNOC appreciates the opportunity to provide these comments. We also recognize the NRC's efforts in this regard towards eliminating unnecessary and overly burdensome regulations. This effort utilizes sound regulatory principles and is consistent with the NUMARC "Industrywide Initiative".

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If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4000, or Mr. Kevin J. Moles of my staff, at extension 4565.

Very truly yours,

A handwritten signature in dark ink, appearing to read "B. Withers". The signature is fluid and cursive, with a large initial "B" and a stylized "W".

Bart D. Withers
President and
Chief Executive Officer

BDW/jan

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