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(26)

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Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Mail StopT-6D-69
Washington, D. C. 20555-0001

Subject: Docket No. 50-482: Comments on Proposed Supplement to
NRC Bulletin 96-01, "Control Rod Insertion Problems"

Gentlemen:

In Federal Register Volume 62, Number 97, dated May 20, 1997, (62FR27629) the Nuclear Regulatory Commission (NRC) published for public comment a proposed supplement to NRC Bulletin 96-01, "Control Rod Insertion Problems." Attached to this letter are Wolf Creek Nuclear Operating Corporation's (WCNOC) comments on that proposed bulletin supplement. In addition to the attached comments, WCNOC has participated in the review and development of the industry response to the proposed bulletin supplement. WCNOC supports the comments and positions submitted by the Westinghouse Owners Group and the Nuclear Energy Institute.

If you have any questions concerning this response, please contact me at (316) 364-8831, extension 4034, or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,

Richard A. Muench

RAM/jad

Attachment

cc: E. W. Merschhoff (NRC)
W. D. Johnson (NRC)
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Comments On The Draft Supplement 1 To NRC Bulletin 96-01

The Wolf Creek Nuclear Operating Corporation (WCNOC) offers the following comments on the proposed supplement to NRC Bulletin 96-01:

- Page 27630, Description of Circumstances, under the heading "Wolf Creek Plant"--the second sentence states "Two rods remained at 6 steps withdrawn, two at 12 steps, and one at 18 steps."

This information was originally reported as preliminary observation from the Control Room. Subsequent investigation, as reported in WCNOC Licensee Event Report (LER) 96-01, Revision 0 submitted with WCNOC Letter WO 96-0029, dated February 28, 1996, indicates that the sentence should be revised to read, "One rod remained at 30 steps withdrawn, three at 18 steps, and one at 12 steps."

- Page 27630, Description of Circumstances, under the heading "Wolf Creek Plant"--the last sentence states, "All of the affected rods were in 17x17 VANTAGE 5H fuel assemblies, with burnup greater than 47,600 MWD/MTU."

The value of 47,600 MWD/MTU was based on estimates provided to the NRC early in the event investigation. As reported in WCNOC's response to NRC Bulletin 96-01 (Letter WO 96-0058, dated April 5, 1996) the affected assemblies were all in their third operating cycle with actual burnup exceeding 49,000 MWD/MTU.

- Page 27630, Description of Circumstances, in the seventh paragraph following the paragraph under the heading "North Anna Plant," which begins "At Wolf Creek, subsequent cold...", the eighth sentence, "However, subsequent inspection of the hafnium rod did not indicate any adverse dimensional change.", is incorrect.

That sentence should be replaced with the following information, which was reported in a telephone call with the NRC on February 28, 1996: "Subsequent inspection of the rods did not indicate any adverse dimensional change in the silver-indium-cadmium rods. However, the hafnium rod evidenced signs of guide card wear and hafnium swelling. Several rodlets on the RCCA contained bulges in the range of four to five mils. The maximum diameter observed was 0.387 inches compared to a nominal diameter of 0.381 inches."

- The following action is stated under "Requested Actions" on page 27632: "In addition, end-of-cycle rod drop time tests and drag testing of all rodged fuel assemblies should be performed."

This requirement to test all rodged assemblies is inconsistent with the mid-cycle rod-drop testing previously requested. The testing of only those assemblies that exceed the established threshold for rod drop times is appropriate.

- The following action is stated under "Requested Actions" on page 27632: "Within 30 days after completion of each set of testing, licensees are requested to submit a report that summarizes the data and documents the results obtained."

This 30-day reporting requirement will impose an additional burden on licensee resources during a refueling outage. A 60-day requirement would allow completion of the outage prior to report submission and a lesser impact on licensee resources.