

# Wolf Creek Generating Station, Unit 1

Amendment No. 237, Request for Deviation from  
Fire Protection Requirements

Public Meeting  
July 23, 2024

# Wolf Creek Safety Evaluation Related to Amendment No. 237, Request for Deviation from Fire Protection Requirements

## Meeting Purpose

- To Discuss Amendment No. 237, Request For Deviation from Fire Protection Requirements (ML23165A250)

# Chronology

- License Amendment Request (LAR) Submitted August 2, 2022 (ML22215A000)
- Amendment Issued August 31, 2023 (ML23165A250)
- Licensee Submitted Request for Correction Letter October 19, 2023 (ML23292A357)
- Public Meeting Held on March 25, 2024 (ML24088A312)
- Revised Safety Evaluation (SE) Issued May 9, 2024 (ML23345A160).

# Safety Evaluation

- The SE addresses the acceptability for portable lighting for fires outside the control room and identifies specific fire areas.
- Table 1 in the SE identifies the 10 CFR Part 50 Appendix R, Section III.G.2 fire areas identified by the licensee in its analysis that require operator manual actions to achieve safe shutdown.

# Safety Evaluation

- During the Public Meeting it was identified that the SE did not identify the acceptability of the portable lighting for control room fires.
- 10 CFR Part 50 Appendix R, Section III.G.1 and/or III.G.3 fire areas were not explicitly identified by the licensee in its analysis included with the LAR or LAR Supplements.

# Safety Evaluation

- The NRC staff did not review the use of portable lighting as it applies to 10 CFR Part 50 Appendix R, Section III.G.1 and/or III.G.3 fire areas as they were not explicitly identified by the licensee in its analysis included with the LAR or LAR Supplements.
- The SE could not be revised to include 10 CFR Part 50 Appendix R, Section III.G.1 and/or III.G.3 fire areas because the amendment was based on the staff review of the information in the LAR and supplements.

# Regulatory Guidance

- When reviewing changes that have the potential to affect operator manual actions (OMAs), the focus of the NRC staff review is the feasibility and reliability of the actions.
- The NRC's guidance for OMA feasibility and reliability analysis is contained in NUREG-1852, "Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire."

# Regulatory Guidance

- Per the guidance contained in NUREG-1852, feasibility and reliability criteria are the same for all OMAs:

Operator manual actions, allowed by existing regulations to satisfy Paragraphs III.G.1 and III.G.3 of Appendix R to 10 CFR Part 50 [Ref. 1], are often identical actions and need to have the same feasibility and reliability goals as the Paragraph III.G.2 operator manual actions which require prior staff approval to ensure an adequate level of plant safety.



# Options

- Options For Amendment No. 237
  1. Implement Amendment No. 237
    - Submit an additional license amendment request
    - Analysis would cover affected actions not included in Amendment No. 237
  2. Request that the NRC rescind Amendment No. 237
    - Submit a new license amendment request
    - Analysis would cover all of the affected actions.

# Submittal Guidance

- For either option and consistent with the guidance in NUREG-1852, the LAR should include:
  1. Identification of all the OMAs affected by the change to portable lighting.
  2. For each of these OMAs:
    - a. Identify the fire area(s) where a fire that requires the OMA may occur;
    - b. Identify the fire area(s) where the OMA(s) occur, including travel paths; and,
    - c. Summarize the results of the updated feasibility and reliability analysis that considers the change to portable lighting.

# Wolf Creek Safety Evaluation Related to Amendment No. 237, Request for Deviation from Fire Protection Requirements

## Comments/Questions