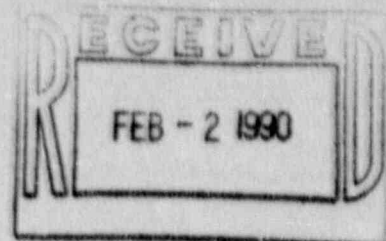


WOLF CREEK

NUCLEAR OPERATING CORPORATION



Forrest T. Rhodes
Vice President
Engineering & Technical Services

January 30, 1990

ET 90-0023

R. D. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Subject: Docket No. 50-482, Response to Generic Letter
89-13, "Service Water System Problems Affecting
Safety-Related Equipment"

Gentlemen:

This letter transmits Wolf Creek Nuclear Operating Corporation's response to Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment". This Generic Letter requires licensees to develop appropriate testing and maintenance programs to ensure that safety-related "service water" systems conform to existing design criteria.

The attached response provides the status of WCNOC's program to meet the recommendations of the subject Generic Letter. If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff.

Very truly yours,

Forrest T. Rhodes
Vice President
Engineering & Technical Services

FTR/nkh

Attachment

cc: M. E. Skow (NRC), w/a
E. J. Holler (NRC), w/a
D. V. Pickett (NRC), w/a
Document Control Desk (NRC), w/a

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Forrest T. Rhodes, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering and Technical Services of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the content thereof; that he has executed that same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Forrest T. Rhodes
Forrest T. Rhodes
Vice President
Engineering & Technical Services

SUBSCRIBED and sworn to before me this 29 day of January, 1990.

Marlene Neesbom
Notary Public

Expiration Date August 4, 1990



RESPONSE TO

GENERIC LETTER 89-13

Service Water Problems Affecting Safety-Related Equipment

In response to the five recommendations of Generic Letter 89-13, Wolf Creek Nuclear Operating Corporation (WCNOC) has conducted the appropriate reviews and generated plans and programs necessary to meet those recommended actions. Summarized below are the initial responses to each of the five recommendations. These responses refer to "service water" systems as defined in Generic Letter 89-13.

Recommendation I

The guidance of Enclosure 1 to Generic Letter 89-13 was reviewed against existing WCNOC programs to reduce "service water" flow blockage due to biofouling. These guidelines were verified to exist in WCNOC procedures.

An equally effective alternative to the NRC guidance relative to sampling water and substrate for Asiatic clams has been utilized. This alternative involves annual substrate sampling below, at and above the Make-up Water Screenhouse (MUSH) and monitoring clam movements on the Neosho River to identify movement toward the Wolf Creek Cooling Lake in advance of establishment of a population. Larval sampling will be employed should a Asiatic clam population establish itself in the cooling lake.

These surveillance and control programs are part of existing programs and procedures and are fully developed and implemented.

Recommendation II

An initial and periodic test program is recommended to verify heat transfer capability of all safety-related heat exchangers cooled by "service water".

The safety related heat exchangers cooled by "service water" are identified and a program for initial and periodic testing is complete. The initial testing will be completed by the end of Refuel V with periodic testing conducted between Refuel V and VI and again between Refuel VI and VII.

An equally effective alternative to the NRC guidance relative to testing safety-related room coolers has been incorporated into the WCNOC testing program. Due to the lack of significant heat load on safety-related room coolers, this alternative provides for selecting and testing at least one safety-related room cooler each cycle. This representative sample will indicate the performance capability of all safety-related room coolers due to the similar operational and design considerations.

Program planning and scheduling is complete for implementation of Part II Recommendations. The initial test program will be complete at the end of Refuel V. The test data gathered from the initial test program will be used to develop the periodic test program.

Recommendation III

WCNOC procedures are in place establishing a routine inspection and maintenance program to ensure corrosion, erosion, protective coating failure, silting, and biofouling cannot degrade the performance of the safety-related systems supplied by "service water". These programs are dynamic in nature so that, based on engineering reviews, results of field inspections and the heat exchanger test program, the overall program could be reduced or expanded in the future.

Actions required to implement the recommendations of Part III are already a part of the WCNOC inspection and maintenance programs. Therefore, implementation relative to this section is complete.

Recommendation IV

WCNOC has developed a plan and schedule to accomplish the reviews, evaluations, and inspections recommended in Part IV. Included in these activities is analysis of data gathered under the testing program in Recommendations II and III.

An equally effective alternative to the NRC guidance related to system walkdowns is noted. Based on discussions with the NRC Staff, it was determined that the preoperational system walkdowns are adequate to fulfill the intent of this portion of the recommendation.

The planning and scheduling of a program which meets the intent of Recommendation IV is complete. Implementation of this plan is scheduled for completion in March, 1991.

Recommendation V

A review was performed of maintenance practices, operating and emergency procedures and training related to the "service water system". Recent reviews of Emergency Response Procedures conducted to ensure conformance to Westinghouse Owners Group Emergency Response Guidelines, Rev. 1A and correlation of Technical Specification Surveillance Requirements to the surveillance program were included in the response to this recommendation.

This review is complete and concluded that current WCNOC practices and programs minimize errors in operation, repair and maintenance of "service water system".

Conclusion

The above described actions ensure that the "service water" supplied to safety-related systems and components performs in accordance with design criteria and that appropriate testing and surveillance methods are in place to ensure continued performance in accordance with design requirements. These programs meet the intent of Generic Letter 89-13.