

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Forrest T. Rhodes  
Vice President  
Engineering & Technical Services

March 2, 1990

ET 90-0043

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

Reference: Letter dated March 23, 1989, from D. V. Pickett, NRC,  
to B. D. Withers, WCNOG  
Subject: Docket No. 50-482: Revision to Technical Specification  
3/4.8.4 - Deletion of References to Table 3.8-1

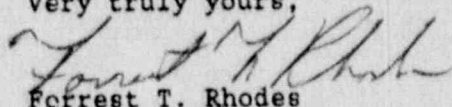
Gentlemen:

The purpose of this letter is to transmit an application for amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station (WCGS), Unit No. 1. This license amendment request would revise Technical Specification Surveillance Requirement 4.8.4.1 and the Technical Specification Table of Contents to delete the reference to Table 3.8-1. Table 3.8-1 had been previously removed from the WCGS Technical Specifications by Amendment 28 which was transmitted to Wolf Creek Nuclear Operating Corporation (WCNOG) in the Reference.

A Safety Evaluation and No Significant Hazards Consideration determination are provided as Attachments I and II, respectively. The proposed changes to the Technical Specifications are provided in Attachment III. In accordance with 10 CFR 50.91, a copy of this application, with attachments is being provided to the designated Kansas State official. This proposed revision to the WCGS Technical Specifications will be fully implemented within 30 days of formal Nuclear Regulatory Commission approval.

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

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Attachments: I - Safety Evaluation  
II - Addressing The Standards to 10 CFR 50.92  
III - Proposed Technical Specification Changes

cc: G. W. Allen (KDHE) w/a  
E. J. Holler (NRC) w/a  
R. D. Martin (NRC) w/a  
D. V. Pickett (NRC) w/a  
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COUNTY OF COFFEY    )

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 2nd day of March, 1990.

Marlin Heathman  
Notary Public

Expiration Date August 4, 1990



**ATTACHMENT I**  
**SAFETY EVALUATION**



## **SAFETY EVALUATION**

### **Description of Changes**

Technical Specification 3/4.8.4 provides the requirements for Containment Penetration Conductor Overcurrent Protective Devices. On March 23, 1989, the NRC issued Amendment 28 which revised Technical Specification 3/4.8.4 and deleted Table 3.8-1, which listed the Containment Penetration Conductor Overcurrent Protect Devices. During a review of Amendment 28 by Wolf Creek Nuclear Operating Corporation (WCNOC) personnel, it was discovered that there were still references to Table 3.8-1 in the Technical Specifications.

This proposed Technical Specification change would delete the references to Table 3.8-1 which remain in the WCGS Technical Specifications. These remaining references are located in the Table of Contents and in Surveillance Requirement 4.8.4.1.

### **EVALUATION**

Table 3.8-1 provided information on the location, size and equipment protected by the Containment Penetration Conductor Overcurrent Protective Devices. The information which was in Table 3.8-1 is currently being administratively controlled in plant procedures. The references to this table which remain were inadvertently overlooked when the table was originally requested to be removed from Technical Specifications. Removing the references to the table is now being pursued in order to minimize the confusion from referring to a table which no longer exists. This is an administrative change which does not change any of the requirements of the WCGS Technical Specifications. This change does not include any technical changes and is considered to be editorial in nature.

Based on the above discussions and the considerations presented in Attachment II, the proposed revision to the WCGS Technical Specifications does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report; or create a possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report; or reduce the margin of safety as defined in the basis for any technical specification. Therefore, the proposed revision does not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

**ATTACHMENT II**

**ADDRESSING THE STANDARDS IN 10 CFR 50.92**



### **ADDRESSING THE STANDARDS IN 10 CFR 50.92**

The proposed change would revise the Technical Specification Table of Contents and Technical Specification Surveillance Requirement 4.8.4.1 to delete references to Table 3.8-1 which was previously removed from Technical Specifications in Amendment 28. The following sections discuss the proposed changes under the three 10 CFR 50.92 standards:

#### **Standard 1 - Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated**

These changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. This is an administrative change which does not change any of the requirements of the current Technical Specifications. This change does not include any technical changes and is considered to be editorial in nature.

#### **Standard 2 - Create the Possibility of a New or Different Kind of Accident from any Accident Previously Evaluated**

These changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes are administrative in nature. No physical alterations to the plant equipment or plant operations are proposed.

#### **Standard 3 - Involve a Significant Reduction in a Margin of Safety**

The proposed amendment does not involve a significant reduction in a margin of safety. This change merely deletes references to a table which was previously removed from Technical Specifications. This change is an editorial change which has no effect on any margin of safety.

The commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing examples of amendments that are not likely to involve a Significant Hazards Consideration (51 CFR 7751). Among those examples are "A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the Technical Specifications, corrections of an error, or a change in nomenclature" and "A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications..."

Based on the above discussions and those presented in Attachment I, it has been determined that the requested Technical Specification revisions do not involve a significant increase in the probability or consequences of an accident or other adverse condition over previous evaluations; or create the possibility of a new or different kind of accident over previous evaluations; or involve a significant reduction in a margin of safety. Therefore, the requested changes do not involve a significant hazards consideration.