

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan
Vice President Nuclear Assurance

October 21, 1993

NA 93-0197

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

Subject: Docket No. 50-482: Revision to Technical
Specification 6.0 - Administrative Control

Gentlemen:

This letter transmits an application for amendment to Facility Operating License No. NPF-42, for Wolf Creek Generating Station (WCGS), Unit No. 1. This license amendment request proposes revising Technical Specification Section 6.3.1 to revise the current requirement for the Manager Operations to hold a senior reactor operator license. The proposed technical specification will require the Manager Operations to either hold or have held a senior reactor operator license at a similar unit. This proposed change will enhance the effective operation of the facility by enabling the Manager Operations to devote more attention to the managerial responsibilities of the position and to ensure that WCGS is operated safely and in accordance with the requirements of the WCGS Operating License. Additionally, this request revises Technical Specification 6.5.1.2 to delete specific title designations from the Plant Safety Review Committee membership, while at the same time not altering the required composition for areas of expertise, representation by management, or the quorum.

Attachment I provides a description of the amendment along with a Safety Evaluation. Attachment II provides the No Significant Hazards Consideration Determination. Attachment III provides the Environmental Impact Determination. The specific change to the technical specifications proposed by this request is provided in Attachment IV.

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.

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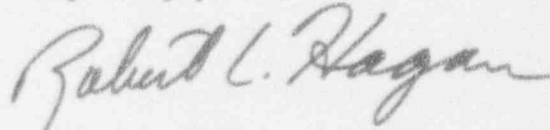
P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-8831

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If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4553, or Mr. Kevin J. Moles, at extension 4565.

Very truly yours,



Robert C. Hagan
Vice President Nuclear Assurance

RCH/jra

Attachments I - Safety Evaluation
 II - No Significant Hazards Consideration Determination
 III - Environmental Impact Determination
 IV - Proposed Technical Specification Change

cc: G. W. Allen (KDHE), w/a
 J. L. Milhoan (NRC), w/a
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 W. D. Reckley (NRC), w/a
 L. A. Yandell (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Robert C. Hagan, of lawful age, being first duly sworn upon oath says that he is Vice President Nuclear Assurance 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

Robert C. Hagan

Robert C. Hagan
Vice President
Nuclear Assurance

SUBSCRIBED and sworn to before me this 21st day of October, 1993.

Donald L. Elliott
Notary Public

Expiration Date 5/14/95



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ATTACHMENT I
SAFETY EVALUATION

Safety Evaluation

Proposed Change

This amendment request proposes to revise Technical Specification 6.3.1d. to require that the Manager Operations hold or have held a senior reactor operator license prior to assuming the position as Manager Operations. Additionally, this request revises Technical Specification 6.5.1.2 to delete specific title designations from the Plant Safety Review Committee (PSRC) membership, while at the same time not altering the required composition for areas of expertise, representation by management, or the quorum.

Background

Technical Specification 6.3.1 currently requires each member of the unit staff to meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel." ANSI/ANS 3.1-1978 Section 4.2.2 requires that at the time of initial core loading or appointment to the position, whichever is later, the operations manager shall hold a senior reactor operator license.

The guidance that the operations manager hold a senior reactor operator license was revised in ANS/ANS 3.1-1987. The 1987 revision of ANSI/ANS 3.1 states that the operations manager shall meet one of four special requirements:

- hold a senior reactor operator license
- have held a license for a similar unit
- have been certified at an appropriate simulator for equivalent senior operator knowledge
- have been certified on plant operational knowledge based on the plant manager job analysis

The 1987 revision also states that if the operations manager does not hold an NRC license, then the "Operations Middle Manager" shall hold a senior reactor operator license.

Wolf Creek Nuclear Operating Corporation (WCNOC) is proposing to revise Section 6.5.1.2 to remove the position titles associated with the composition of the PSRC. This proposed revision requires the Vice President Plant Operations to designate in writing the Chairman and Alternate Chairman of the PSRC. PSRC membership shall include a minimum of six additional members appointed by the Chairman and an additional member appointed by the Vice President Engineering. Selected members shall include, at a minimum, management responsible for the following

areas of expertise: operations, maintenance, instrumentation and controls, chemistry, health physics and engineering. A single individual may cover multiple disciplines. Section 6.5.1.3 is being annotated to indicate that the alternate for the engineering representative is appointed by the Vice President Engineering.

Evaluation of Proposed Change

The proposed technical specification change does not adversely affect the safe operation of Wolf Creek Generating Station (WCGS). The current requirement in Technical Specification 6.3.1 for the Manager Operations to hold a senior reactor operator license requires the expenditure of a significant amount of time in regualification training. This training typically consumes a minimum of six weeks for senior reactor operator licensees on an annual basis. As stated in the Updated Safety Analysis Report (USAR), the Manager Operations is responsible for the operation of WCGS and the management of the station operations personnel. To facilitate this responsibility the Operations Division is structured to provide several layers of direct technical supervision. Each level of shift supervision, from the Supervising Operator on shift to the Shift Supervisor, are supervised by an individual currently holding a senior reactor operator license, typically the Supervisor Operations.

As identified in Technical Specification 6.3.1 and Table 13.1-1 of the USAR, the current requirement for the Manager Operations to hold a senior reactor operator license is based on the minimum qualifications recommended in ANSI/ANS 3.1-1978. This guidance was revised in the 1987 revision of the ANSI/ANS 3.1. The current guidance recommends several options, one of which is for the operations manager to have held a license for a similar unit. In the case where the operations manager does not hold an NRC license, ANSI/ANS 3.1-1987 recommends that the "Operations Middle Manager" hold an NRC senior reactor operator license. The proposed technical specification change clearly delineates the requirements for the Supervisor Operations to maintain a senior reactor operator license and is consistent with the guidance of ANSI/ANS 3.1-1987. The USAR will be revised to take an exception to the particular requirement for the Manager Operations to hold a senior reactor operator license at the time of appointment to the position. The USAR change will be initiated upon NRC approval of the license amendment request. The Manager Operations, by having been licensed as a senior reactor operator at a similar unit, will have gained the necessary skills, level of knowledge, and experience to fully understand the operation of plant equipment, the requirements for proper watchstanding, and for ensuring that WCGS is operated in compliance with technical specifications and other license requirements. The Manager Operations does not stand Control Room watches nor manipulate controls such that a senior reactor operator license is required.

The proposed change will enhance the safe operation of the plant by increasing the amount of time the Manager Operations can devote to fulfilling his primary responsibilities. WCNOG believes that this position, regarding the senior reactor operator license requirements, is advantageous because it allows a license holder to assume other positions within the organization and develop additional skills and insights. A typical scenario could have a Supervisor Operations assume the position of Manager Maintenance and Modifications, surrender his senior reactor operator license, and at some time in the future assume the Manager Operations position; bringing with him the additional skills and insights.

Regulation 10 CFR 50.54(l) states:

"The licensee shall designate individuals to be responsible for directing the licensed activities of licensed operators. These individuals shall be licensed as senior operators pursuant to part 55 of this chapter."

This regulation implies that the Shift Supervisors are required to report to an individual (for WCGS this is the Supervisor Operations) licensed as a senior reactor operator. These requirements can be satisfied during periods of transition when the Supervisor Operations vacates the position as discussed below. The Supervisor Operations position is a projected career path for Shift Supervisors, all of whom would be fully capable of assuming the position. A typical transition, which has occurred previously, is the Supervisor Operations assuming a new position within WCNOG. The most likely course of action would be to promote one of the Shift Supervisors to the Supervisor Operations position and conduct a turnover in a controlled manner. Similar action can be presumed to be taken for a resignation by the Supervisor Operations. WCNOG has additional personnel who hold a senior reactor operator license filling the Supervisor Operations Support position and in various staff and training positions that ensure the capability to fill all positions requiring a senior reactor operator license.

The proposed change to delete specific title designations from the PSRC allows more flexibility in appointment of PSRC members and also eliminates the need for amendment requests based solely on title changes. The proposed change would specify a minimum of six members in addition to the PSRC Chairman, however, the requirements for quorum, for representation by management, and for specified areas of expertise remain unchanged. The proposed change is consistent with the NRC Finally Policy Statement on Technical Specification Improvements for Nuclear Power Reactors and the industry effort to simplify and improve technical specifications.

ATTACHMENT II

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

No Significant Hazards Consideration Determination

The proposed license amendment would revise Technical Specification 6.3.1 to revise the current requirement for the Manager Operations to hold a senior reactor operator license. The proposed technical specification will require the Manager Operations to either hold or have held a senior reactor operator license at WCGS. Additionally, this request revises Technical Specification 6.5.1.2 to delete specific title designations from the Plant Safety Review Committee membership. The following sections discuss the proposed change under the three standards of 10 CFR 50.92.

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

The proposed change affects only an administrative control, which was based on the existing industry guidance in ANSI/ANS 3.1-1978, that recommended the operations manager hold a senior reactor operator license. The current guidance in ANSI/ANS 3.1-1987 recommends, as one option, that the operations manager have held a license on a similar unit with the "Operations Middle Manager" holding a senior reactor operator license. The proposed change in this license amendment request is consistent with the current guidance.

The proposed change does not alter the design of any system, structure, or component. It does not change the way any plant systems are operated. It does not reduce the knowledge, qualifications, or skills of any watchstander, and does not affect the way the Operations Division is managed other than to allow the Manager Operations to focus his efforts on maintaining the effective performance of his personnel and to ensuring the plant is operated safely and in accordance with the requirements of the Operating License.

The proposed change does not detract from the Manager Operations ability to perform his primary responsibilities. By having previously held a senior reactor operator license he will have gained the necessary training, skills, and experience to fully understand the operation of plant equipment and the requirements for proper watchstanding.

The proposed change does not weaken the supervisory chain that presently exists in the Operations Division. Control Room operators will continue to be supervised by NRC licensed personnel. The proposed change is intended to improve the ability of the Manager Operations to provide the plant oversight required of his position.

The change to the PSRC membership is administrative in nature only. The requirements for quorum, for representation by management, and for specified areas of expertise remain unchanged.

Standard II - Create the Possibility of a New of Different Kind of Accident

The proposed changes do not affect the design or function of any plant system, structure or component. It does not affect in any way the performance of NRC licensed operators, nor does it change the way any plant equipment is operated. Operation of the plant in conformance with technical specifications and other license requirements will continue to be supervised by personnel who hold an NRC senior reactor operator license. The proposed changes do not introduce any new failure modes.

The proposed change to Section 6.3.1 is intended to remove an administrative requirement which adds a significant burden to the Manager Operations without significantly contributing to his effectiveness in managing plant operation and ensuring that the plant is operated safely and in accordance with the requirements of the Operating License. Deletion of specific title designations of the PSRC membership does not impact the performance or effectiveness of the PSRC.

Standard III - Involve a Significant Reduction in the Margin of Safety

The proposed changes involves only an administrative control which is not related to the margin of safety as defined in the technical specifications. The proposed change to Section 6.3.1 does not reduce the level of knowledge or experience required of an individual who fills the Manger Operations position, nor does it affect the conservative manner in which the plant is operated. Control Room operators will continue to be supervised by personnel who hold a senior reactor operator license.

The change to the PSRC membership is administrative in nature only. The requirements for quorum, for representation by management, and for specified areas of expertise remain unchanged.

Based on the above, 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 or condition over previous evaluations; or involve a significant reduction in a margin of safety. Therefore, the requested license amendment does not involve a significant hazards consideration.

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ATTACHMENT III
ENVIRONMENTAL IMPACT DETERMINATION

Environmental Impact Determination

This amendment request meets the criteria specified in 10 CFR 51.22(c)(9) as specified below:

- (i) the amendment involves no significant hazards consideration

As demonstrated in the No Significant Hazards Consideration Determination in Attachment II, the proposed amendment does not involve any significant hazards consideration.

- (ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite

The proposed change does not affect the design or function of any plant system, structure or component. It does not affect in any way the performance of NRC licensed operators, nor does it change the way any plant equipment is operated. The proposed change does not create new types of effluents or cause any significant increase in the amounts of any effluents released offsite.

- (iii) there is no significant increase in individual or cumulative occupational radiation exposure

The proposed change is administrative in nature and does not create additional exposure to personnel nor affect levels of radiation present. Also the proposed change does not result in any increase in individual or cumulative occupational radiation exposure.

Based on the above it is concluded that there will be no impact on the environment resulting from this change and the change meets the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.21 relative to requiring a specific environmental assessment by the Commission.