

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan  
Vice President Nuclear Assurance

October 21, 1993

NA 93-0196

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 Controls

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 6.0 to incorporate qualified reviewer provisions for reviewing and approving station procedures.

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 proposed change to the technical specification is provided as Attachment IV.

In accordance with 10CFR50.91, a copy of this application, with attachments, is being provided to the designated Kansas State Official. This request is neither exigent nor emergency. However, your prompt review is requested as the implementation of a Qualified Reviewer Program is important to the overall program to upgrade procedure control and maintenance at WCGS. Wolf Creek Nuclear Operating Corporation (WCNOC) requests that the effective date for the change be 90 days after NRC issuance of the amendment to allow for implementation and distribution of procedures governing the Qualified Reviewer Program.

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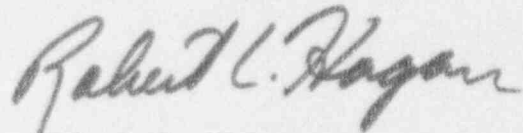
P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-8831

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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  
     G. A. Pick (NRC), w/a  
     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 21<sup>st</sup> day of October, 1993.

Samuel L. Elliott  
Notary Public

Expiration Date 5/14/95



ATTACHMENT I  
SAFETY EVALUATION

## Safety Evaluation

### Proposed Change

Wolf Creek Nuclear Operating Corporation (WCNOC) proposes to revise Wolf Creek Generating Station (WCGS) Technical Specifications Sections 6.5.1, Plant Safety Review Committee (PSRC) and 6.8, Procedures and Programs. This license amendment request implements a Qualified Reviewer Program for the review and approval of new procedures and procedure changes, and modifies the approval requirements to allow the responsible Manager for the functional area of the procedure to approve changes to procedures.

### Discussion of Proposed Changes

#### Qualified Reviewer Program

WCGS management, in a continuing effort to improve the efficiency and effectiveness of its staff, has determined that the adoption of a Qualified Reviewer Program is a desirable alternative to the present review methods utilized by the Plant Safety Review Committee (PSRC). One of the goals of the Qualified Reviewer Program is the streamlining of the procedure change, review and approval process. As a result, a proposed amendment to WCGS technical specifications has been developed to incorporate qualified reviewer provisions.

The Qualified Reviewer Program is a procedural review and approval process that utilizes Qualified Reviewers who perform a review function and responsible Managers who perform an approval function for new procedures and procedure changes. This proposed program modifies the scope of items required to be reviewed by the PSRC and approved by the Vice President Plant Operations.

The responsibility and authority to perform the functions of approval or disapproval of procedures as well as evaluating for an Unreviewed Safety Question (USQ) will be transferred to the responsible Manager or his designee. A description of the development and implementation of this program at WCGS is provided below:

- An Administrative Control Procedure will be developed to implement the Qualified Reviewer Program. The Qualified Reviewer will be an individual knowledgeable in the functional area affected and may be from the same organization, but cannot be the preparer of the procedure or procedure change. The PSRC Chairman will approve WCNOC personnel recommended to be Qualified Reviewers for specific classes of procedures. Each new procedure or procedure change will be reviewed by the designated Qualified Reviewer. The Qualified Reviewer determines when a cross-disciplinary review by other personnel is necessary prior to approval. The new procedure or procedure change and accompanying regulatory review documentation (i.e., evaluation of the proposed change or new procedure in accordance with 10CFR50.59, 10CFR50.54 and license conditions) is

reviewed by the responsible Manager. The responsible Manager verifies whether a 10CFR50.59 safety evaluation is required. If not required, the new procedure or procedure change is then approved by the responsible Manager or his designee. If a 10CFR50.59 safety evaluation is required, the new procedure or procedure change including the 10CFR50.59 safety evaluation is reviewed by the PSRC. As part of the Qualified Reviewer Program, record keeping requirements will be established for procedure reviews conducted in accordance with the Qualified Reviewer Program.

- Selected WCGS procedures will be identified as Administrative Control Procedures. The Vice President Plant Operations will approve Administrative Control Procedures. Procedures other than Administrative Control Procedures shall be approved by the responsible Manager or his designee. The responsible Managers or their designee(s) will be designated in accordance with Administrative Control Procedures. The Manager Plant Support shall approve the Security Plan and implementing procedures. The Manager Regulatory Services shall approve the Radiological Emergency Response Plan and implementing procedures.
- The PSRC continues to be responsible for the review and recommendation of approval or disapproval of Administrative Control Procedures and any new procedure or procedure change that requires an Unreviewed Safety Question Determination (i.e., 10CFR50.59 safety evaluation) be performed.
- Temporary changes will be approved by two knowledgeable members of the WCNOG staff. At least one of these will be a member of supervision. If the change affects operations procedures, the change will be approved by knowledgeable personnel, one will be a person holding a senior reactor operator license. Temporary changes will be reviewed by the designated Qualified Reviewer (including a cross-disciplinary review, if necessary) and approved by the responsible Manager or his designee as appropriate within 14 days of implementation.

## Evaluation

### Qualified Reviewer Program

By limiting the scope of procedures requiring review by the PSRC and approval by the Vice President Plant Operations, several benefits will be realized. These benefits are summarized below:

- The implementation of a Qualified Reviewer Program will allow WCGS to better utilize the wide knowledge base of personnel to make changes to procedures while still providing adequate controls to ensure that an acceptable level of independent review is conducted.
- Utilization of Qualified Reviewers will expedite the procedure review process by eliminating the requirement for review by the PSRC. Timely procedure approval will benefit the station by allowing procedural enhancements to be implemented in a more timely manner.

- These changes will allow the approval of a procedure by the responsible Manager or his designee in the area of expertise for the procedure. This will provide the Vice President Plant Operation with more time to devote to other responsibilities. The current bases, requiring the Vice President Plant Operations to approve Major Procedures and Revision 0 of Minor procedures prior to implementation, ensures that overall plant impact is considered from an adequate management and power plant experience base. Implementation of the Qualified Reviewer Program will continue to fulfill this condition. WCNOG concludes that the proposed changes do not reduce the effectiveness of the Specification and will relieve the Vice President Plant Operations of administrative duties which responsible Managers are fully capable and qualified to perform.
- Key station personnel assigned to perform PSRC review functions will have additional time to conduct critical and thorough reviews of issues with the potential for affecting nuclear safety.
- WCNOG concludes that the review and approval process for temporary changes is equivalent to the current process because it continues to provide knowledgeable qualified personnel and supervisory oversight and when necessary, operations oversight for approval of temporary changes.

The requirement for a cross-disciplinary review ensures a comprehensive technical review is provided by qualified personnel from other disciplines, while not burdening these personnel with review requirements for which they can provide no added expertise. Any procedure that requires active interface with another department is required to have a cross-disciplinary review.

Qualified Reviewers implementing the review process will be designated by the PSRC Chairman. This designation will consider the disciplines and procedure categories for which the reviewer is responsible. Each individual designated to perform reviews will meet the appropriate qualifications of ANSI/ANS 3.1-1978. These qualifications will ensure that the Qualified Reviewer provides a level of technical experience and expertise equivalent to that provided by the PSRC as these Qualified Reviewers will have the technical knowledge and familiarity in these areas of review.

Procedures that do not require a review by the PSRC will be approved by the Manager responsible for the affected procedure as specified in Administrative Control Procedures. Manager approval for these changes is an acceptable level of authority, since these Managers are required to meet the same qualifications as the PSRC members. This places the approval authority for procedures at a level consistent with the responsibility for implementation of the procedure.

The Qualified Reviewer Program and Manager approval authority are consistent with the standard technical specifications and other regulatory requirements. Similar procedure review programs have been approved by the NRC for other nuclear facilities, including Limerick Generating Station, Peachbottom Generating Station, Fort Calhoun Nuclear Power Station and Callaway.



Deletion of PSRC Review of Security Plan and Emergency Plan and Implementing Procedures

On April 1, 1993, the NRC published a notice of opportunity for public comment for a proposed generic communication (58 FR 17293) which provides guidance for relocating certain requirements (without reducing them) from the Technical Specifications to other NRC approved program documents. The proposed generic communication specifically addressed the reviews of the Emergency Plan and implementing procedures and the Physical Security Plan and implementing procedures. The proposed changes would delete redundant references to review requirements which originate in Title 10 of the Code of Federal Regulations (10 CFR 50.54(t) for Emergency Preparedness and 10 CFR 50.54(r), 10 CFR 73.40, 10 CFR 73.55, and 10 CFR 73.56 for Security) from the facility's Technical Specifications.

This change is acceptable since the Qualified Reviewer Program establishes alternate provisions regarding the review of these plans and implementing procedures. The plant operation's perspective in the review of these plans and implementing procedures will not be reduced because operations personnel will be involved with cross-disciplinary reviews as appropriate.

**Evaluation Summary**

The proposed changes are administrative in nature. The institution of the Qualified Reviewer Program will improve the effectiveness of the PSRC by concentrating their focus on issues with the potential to be more important to safety. There are no changes to plant equipment, plant design, limiting safety system settings, or plant system operation. The Qualified Reviewer Program requires review prior to approval of any new procedure or procedure change by a qualified individual (other than the preparer) who is knowledgeable in the functional area affected. The program will be controlled by Administrative Control Procedures, which will continue to be reviewed by the PSRC and approved by the Vice President Plant Operations. The PSRC will continue to review those new procedures and procedure changes for which an Unreviewed Safety Question Determination (i.e., 10CFR50.59 safety evaluation) is required to be performed. Therefore, the proposed administrative change will not decrease the current safety oversight function which the PSRC performs. Implementation of the proposed Qualified Reviewer Program will allow WCGS to optimize its management resources by permitting the PSRC to focus on those items having a greater potential for affecting nuclear safety.

The Radiological Emergency Response Plan and implementing procedures and Security Plans and implementing procedures will be approved by the Manager responsible for the program. This change will place the responsibility with the individuals most cognizant of the program and therefore will not decrease the effectiveness of the programs.



ATTACHMENT II

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

### **No Significant Hazards Consideration Determination**

The proposed license amendment would revise 11f Creek Generating Station Technical Specification Sections 6.5.1, Plant Safety Review Committee (PSRC) Responsibilities and 6.8, Procedures and Programs to provide for the implementation of a Qualified Reviewer Program for the review and approval of new procedures and procedure changes at WCGS. The proposed change does not constitute a significant hazards consideration. In support of this conclusion, an evaluation of each of the three standards as set forth in 10CFR50.92 is provided below:

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

The proposed change is administrative in nature and provides for (1) procedural reviews through the use of qualified personnel designated by the PSRC Chairman and (2) procedural approval through the use of Managers designated by the Administrative Control Procedures. As part of this program, the Qualified Reviewer will be required to consider, document and implement (if necessary) cross-discipline reviews prior to approval. The program will be controlled by Administrative Control Procedures that will be reviewed by the PSRC and approved by the Vice President Plant Operations. The PSRC will continue to review new procedures and procedure changes for which an Unreviewed Safety Question Determination (i.e., 10CFR50.59 safety evaluation) is required to be performed. The proposed change requires review of any new procedure and procedure change by a qualified individual (other than the preparer) who is knowledgeable in the functional area affected. Therefore, an independent technical review conducted by an individual whose qualification and knowledge encompasses the areas affected by the procedure combined with the added expertise contributed by the cross-disciplinary review will establish an equivalent level of review to that currently provided by the PSRC. The proposed change does not affect any plant hardware, plant design, limiting safety system settings, or plant systems and therefore, does not alter or add any initiating parameters that would cause a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed technical specification change will implement a procedural review and approval process and is strictly administrative in nature. The Qualified Reviewer Program will be controlled by Administrative Control Procedures. These Administrative Control Procedures will be reviewed by the PSRC and approved by the Vice President Plant Operations. The PSRC will continue to review those new procedures and procedure changes for which an Unreviewed Safety Question Determination (i.e., 10CFR50.59 safety evaluation) is required to be performed. Therefore, the proposed administrative change does not reduce the safety review function performed by the PSRC. The proposed change does not involve physical changes to the plant, changes to set points, or operating parameters. There are no potential initiating events that would result in the possibility of a new or different kind of accident from any accident previously evaluated.

**Standard III - Involve a Significant Reduction in a Margin of Safety.**

The proposed change is administrative and is limited to (1) the transfer of procedure review responsibilities to designated Qualified Reviewers and (2) the transfer of procedure approval responsibilities to designated Managers. The PSRC will continue to review and approve those new procedures or procedure changes for which an Unreviewed Safety Question Determination (i.e., 10CFR50.59 safety evaluation) is required to be performed. The change does not alter WCNO's commitment to maintain a management structure that contributes to the safe operation and maintenance of WCGS. No position qualifications are being reduced. The level and quality of PSRC review are maintained, because there will be no change in the collective expertise of the PSRC. The independent review of those items important to nuclear safety by the PSRC will continue. Sufficient controls are included in the proposed review methodology to insure that the plant conditions and equipment availability required to support the integrity of the analyses and hence the margin to safety will continue to be maintained. It is therefore concluded that the proposed change does not involve a significant reduction in a margin of safety.

On the basis of the above discussions, it has been determined that the requested technical specification revision does 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.

ATTACHMENT III

ENVIRONMENTAL IMPACT DETERMINATION

### Environmental Impact Determination

10CFR51.22(b) specifies the criteria for categorical exclusions from the requirement for a specific environmental assessment per 10CFR50.21. This amendment request meets the criteria specified in 10CFR51.22(c)(9). Specific criteria contained in this section are discussed below:

(i) the amendment involves no significant hazards consideration

As demonstrated in the Significant Hazards Consideration Determination in Attachment II, the requested license amendment does not involve any significant hazards considerations.

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

The requested license amendment involves no change in the facility or operating procedures that would cause an increase in the amount of effluents or create new types of effluents.

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

The nature of the changes is administrative and does not require additional exposure by personnel nor effect levels of radiation present. The proposed change does not result in significant individual or cumulative occupational radiation exposure.

On the basis of 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 10CFR51.22 for a categorical exclusion from the requirements of 10CFR50.21 relative to specific environmental assessment by the Commission.