

# HUNTON & WILLIAMS

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April 23, 1991

U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852  
Attn: Document Control Desk

BY FEDERAL EXPRESS

Kansas Gas and Electric Company  
(Wolf Creek Generating Station):  
NRC Operating License NPF-42

Gentlemen:

Pursuant to 10 C.F.R. §§ 50.4(b)(2)(ii) and 50.90, Kansas Gas and Electric Company (KG&E) transmits herewith an application for amendment to Facility Operating License No. NPF-42.

This application requests that the Wolf Creek Operating License be amended by the addition of a footnote to ¶ 2.A, memorializing the transfer of KG&E's possession-only interest in NPF-42 to a wholly owned subsidiary of The Kansas Power and Light Company. The transfer will occur upon the merger of KG&E with and into that subsidiary, which is presently in existence and named KCA Corporation. It will be renamed Kansas Gas and Electric Company immediately upon consummation of the merger. No other changes to the license are associated with the merger.

KG&E has already filed on March 28 a request with the Commission, pursuant to 10 C.F.R. § 50.80, for transfer of its license interest. This amendment application is made pursuant to subsequent discussions with the Staff, and refers to the license amendment request in order to avoid duplication. KG&E requests that the Staff review the two documents together.

As noted in the application, the merger which forms the basis for the requested license transfer and amendment requires the approval of other agencies beyond the NRC. In addition, it must be completed by December 31, 1991, or it becomes subject to cancellation by either party. There are significant financial and management advantages to completing the merger as early as possible before that date, and progress before the other agencies presently appears to be consistent with obtaining all such approvals substantially before year's end.

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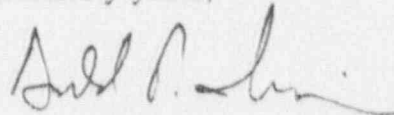
KG&E therefore requests that the NRC process and approve its license transfer and amendment request as promptly as possible, making its approval effective upon the consummation of the merger. KG&E commits to informing the Staff in writing of the merger in writing within one working day after its completion. In the meantime, KG&E will keep the Staff fully and promptly informed of the progress of the merger in other pertinent arenas, and assures the Staff of its full cooperation in providing the information necessary to enable the Staff to complete a timely review.

Under 10 C.F.R. §§ 170.12(b) and 170.21 the costs of review of this application are recoverable by the Staff upon presentation of invoices upon completion or at six-month intervals. No license fee is required at this point.

Pursuant to 10 C.F.R. § 50.91, KG&E is providing a copy of this application, together with the transfer request on which it is based, to the State of Kansas.

Should you have any questions, please call me or Kent Brown, Group Vice President, Kansas Gas and Electric Company, 316/261-6837.

Sincerely yours,



Donald P. Irwin  
Counsel for Kansas Gas and  
Electric Company

Enclosure

cc w/enclosure: Dr. Thomas E. Murley  
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