



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

December 1, 1984

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

KMLNRC 84-209

Re: Docket No. STN 50-482

Subj: Request for Issuance of Operating License

Gentlemen:

The design, construction, and preoperational testing of the Wolf Creek Generating Station are essentially complete and the plant may be ready for fuel load as early as December 31, 1984. It is requested that the Wolf Creek Operating License be issued so that the fuel load activity may proceed as planned.

The following paragraphs summarize the key issues and remaining activities which bear on your issuance of the Wolf Creek Operating License.

A. Conformance of the plant to the FSAR, design documents, and regulatory commitments.

Except as noted herein, in my judgment, the Wolf Creek Generating Station conforms to the facility description in the FSAR and other information filed on our Docket.

B. Licensing Board Reviews.

On July 2, 1984, the Atomic Safety and Licensing Board issued its initial decision authorizing the issuance of an Operating License for the Wolf Creek Generating Station, Unit No. 1,

8412050448 841201  
PDR ADOCK 05000482  
A PDR

Boo!  
1/1

provided two conditions were met. On July 26, 1984, a Motion of Clarification of Initial Decision was granted that changed the wording of the Board's Order to read that the two conditions must be "met prior to authorization of operations greater than 5% of rated power". Actions required to meet these conditions are scheduled for completion prior to January 15, 1985.

C. NRR Licensing Issues.

1. All outstanding and confirmatory issues have been addressed and await final NRC Staff action. It is expected that all of these items will be closed or resolved in the Wolf Creek Safety Evaluation Report Supplement #5.
2. Proposed plant Technical Specifications and Technical Specification reference documents (Process Control Program and Offsite Dose Calculation Manual) have been submitted and await final NRC Staff action.
3. KG&E requested that the Operating License be issued for a period of 40 years from the date of Operating License issuance. (Ref: KMLNRC 84-102, dated 6/28/84).

D. NRC I&E Issues.

The NRC I&E Task Force for Wolf Creek is performing the inspections necessary to assess plant readiness for fuel load. KG&E is providing status information to the Task Force on matters such as construction and preoperational testing, inspection findings, I&E Bulletins and 10CFR50.55(e) items, and post fuel load testing/operational readiness. The particular categories of I&E issues are addressed as follows:

1. All violations and deviations which are considered by the NRC to be restraints to fuel load will be addressed in time to permit final assessment by NRC personnel.
2. We will provide the information necessary in order that I&E personnel may close all inspection open and unresolved items which are considered by the NRC to be restraints to fuel load.
3. All deficiencies identified to date pursuant to 10 CFR 50.55(e) either have been or will be addressed in order to permit review by I&E personnel. Items that may not be resolved completely prior to fuel load include the following:

- a. Diesel generator keep-warm lube oil pumps (Ref: KMLNRC 84-056 dated 4/5/84 and KMLNRC 84-208 dated 12/1/84).
  - b. Pressurizer Power Operated Relief Valves (Ref: KMLNRC 84-196 dated 11/13/84, KMLNRC 84-199 dated 11/19/84, KMLNRC 84-205 dated 12/1/84).
4. With one exception, all I&E Bulletins applicable to Wolf Creek (through 84-03) have been addressed and await final I&E action. The final inspections required by our response to Bulletin 79-14 are in progress and will be complete prior to fuel load. New Bulletin issues will be addressed within the time period specified in each Bulletin.
  5. Wolf Creek has committed to having an operational Emergency Notification System by fuel load. The NRC is responsible for providing and installing the equipment.

E. Quality Allegations.

The Wolf Creek Quality First Program was established to obtain, investigate, and resolve any quality-related allegations. It is our objective to resolve all allegations having safety significance prior to fuel load. However, should we be unable to resolve certain matters, then each remaining one will be reviewed to assure that power ascension testing can proceed safely during final resolution. Any unresolved allegation will be reviewed and coordinated with the NRC Region IV Allegation Coordinator.

F. Operator Licensing.

Thirty-eight members of our operating staff have been licensed by the NRC. Thirty-three of the 38 are licensed as Senior Reactor Operators and five are licensed as Reactor Operators. This complement is sufficient for plant operations.

G. Preoperational Test Program.

The preoperational test program at Wolf Creek is essentially complete. No preoperational tests identified in the FSAR will be completely deferred until after fuel load. Attachment 1 to this letter identifies FSAR preoperational test deficiencies that may require testing post fuel load. These deficiencies, and any similar items identified later, will be reviewed to

assure that fuel load and initial startup testing can proceed safely until final resolution. In addition, such deficiencies either have been or will be reviewed with NRC Region IV personnel.

#### H. Design and Construction.

Design features and programs having safety significance which may not be complete by fuel load include the following:

1. Post accident monitoring instrumentation (Ref: SLNRC 83-019 dated 4/15/83; SLNRC 84-107 dated 8/16/84; and Letter from BJYoungblood, NRC, to GLKoester, KG&E, dated 8/8/83).
2. Emergency response capabilities (Ref: SLNRC 83-019 dated 4/15/83; Letter from BJYoungblood, NRC, to GLKoester, KG&E, dated 8/8/83; and Wolf Creek SER Supplement 4 Section 22).
3. Detailed control room design review (Ref: SLNRC 84-099 dated 6/29/84; SLNRC 84-111 dated 9/05/84; SLNRC 84-121 dated 10/10/84; and Letter from BJYoungblood, NRC, to GLKoester, KG&E, dated 8/8/83).
4. Seismic qualification of equipment (Ref: SLNRC 84-0120 dated 10/9/84, SLNRC 84-122 dated 10/12/84).
5. Environmental qualification of equipment (Ref: SLNRC 84-0009 dated 1/27/84, SLNRC 84-0034 dated 2/23/84, SLNRC 84-0047 dated 3/21/84, SLNRC 84-0101 dated 6/29/84, and SLNRC 84-0118 dated 10/2/84).
6. Site Grading and Temporary Structures. (A separate letter will be submitted prior to fuel load. The letter will describe the remaining site grading work and temporary structures required for plant testing support.)

#### I. Open Items.

The Wolf Creek Open Items Tracking System (OITS) identifies and tracks hardware, testing, and documentation deficiencies identified at the time of system turnover or during the pre-operational test program. OITS entries are reviewed and classified so as to identify restraints to plant operational modes. All outstanding OITS items classified as potential restraints to fuel load will be closed out or dispositioned

December 1, 1984

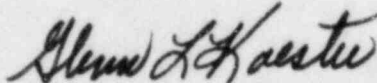
prior to fuel load. Any exceptions will be specifically justified, reviewed with the Resident Inspectors, and, if appropriate, reviewed by the Wolf Creek safety review committees. Similarly, OITS items classified as restraints to Operational Modes 5 through 1 will be closed out or dispositioned before entering the restrained Mode. In addition to the above criteria, the number of non-fuel load restraining open items will be reduced to a manageable level prior to commencing fuel load.

J. Emergency planning full-scale exercise.

The Wolf Creek emergency preparedness full-scale exercise was conducted on November 7, 1984. NRC and FEMA personnel are evaluating the exercise results. In accordance with 10CFR50 Appendix E.IV.F, the evaluations need not be complete until prior to operation above 5% power.

To the best of my knowledge, the above paragraphs address the activities which bear on your issuance of the Wolf Creek Operating License. We respectfully request that the Operating License be issued in order that fuel load and initial startup testing may proceed as planned.

Yours very truly,



Glenn L. Koester  
Vice President - Nuclear

GLK:bb  
Attach (1)  
xc:PO'Connor (2)  
HBundy



FSAR Preoperational Test Deficiencies Which May Require  
Post Fuel Load Retest

1. Pressurizer Relief Valve and PRT Hot Preoperational Test,  
SU3-BB13.
2. RTD/TC Cross Calibration, SU3-BB16. RTD Response Times,  
SU3-SB01.
3. ECCS Check Valves, SU3-EM03.
4. Radiation Monitors, SU3-SP01.

Additional information and any required deferral requests for the  
above will be transmitted to NRR under separate correspondence.

OATH OF AFFIRMATION

STATE OF KANSAS     )  
                              ) SS:  
COUNTY OF SEDGWICK )

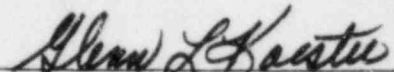
I, Glenn L. Koester, of lawful age, being duly sworn upon oath, do depose, state and affirm that I am Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal, know the contents thereof, and that all statements contained therein are true.

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:



E.D. Prothro, Assistant Secretary

By   
Glenn L. Koester  
Vice President - Nuclear

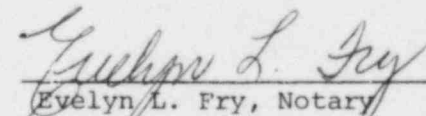
STATE OF KANSAS     )  
                              ) SS:  
COUNTY OF SEDGWICK )

BE IT REMEMBERED that on this 1st day of December, 1984, before me, Evelyn L. Fry, a Notary, personally appeared Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on behalf of and as the act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the date and year above written.



My Commission expires on August 15, 1985.

  
Evelyn L. Fry, Notary