

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Forrest T. Rhodes
Vice President
Engineering & Technical Services

June 19, 1992

ET 92-0121

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
Sections 6.0, Administrative Controls and, 3.3,
Instrumentation

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 proposes revising Technical Specification Sections 6.5.1.2 and 6.8.3 to reflect miscellaneous changes to the WCGS organization and position titles, and clarify the approval process for plant procedures. An editorial change to Section 3.3.3 is also included.

Attachment I provides a description of the amendment along with a Safety Evaluation. Attachment II provides the Significant Hazards Consideration Determination. Attachment III provides the Environmental Impact Determination. The proposed changes to the technical specifications is provided as 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.

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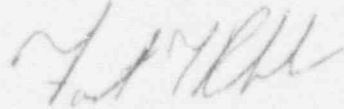
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ADD: 1/

If you have any questions concerning this matter, please contact me or Mr. S. G. Wideman of my staff.

Very truly yours,



Forrest T. Rhodes
Vice President
Engineering & Technical Services

FTR/mes

Attachments: I - Safety Evaluation
II - Significant Hazards Consideration Determination
III - Environmental Impact Determination
IV - Proposed Technical Specification Change

cc: G. W. Allen (KDHE), w/a
A. T. Howell (NRC), w/a
R. D. Martin (NRC), w/a
G. A. Pick (NRC), w/a
W. D. Reckley (NRC), w/a

STATE OF KANSAS)
) SS
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 19 day of June, 1992.

Marlene Heachmar
Notary Public

Expiration Date 8-4-94



ATTACHMENT I
SAFETY EVALUATION

Safety Evaluation

Proposed Change

The purpose of the proposed Technical Specification change is to revise Section 6.8 to clarify the approval process for plant procedures. The current wording could be misinterpreted to require organizations besides Operations to attain the Shift Supervisor's approval for changes to plant procedures, increasing the administrative burden on the Shift Supervisor. An editorial correction to Section 3.3 is also proposed which corrects references to Technical Specifications which were moved to the Offsite Dose Calculation Manual in Amendment 42 to the Technical Specifications. A change is also proposed which would revise Section 6.5.1.2 to reflect a position title change.

Evaluation

Section 6.8.3 of the Technical Specification states,

"Temporary changes to Major Procedures, of the categories listed in Specification 6.8.1 which do not change the intent or generate an unreviewed safety question of the original or subsequent approved procedure, may be made provided such changes to operating procedures are approved by the Shift Supervisor (SRO licensed) and one of the Call Superintendents. For temporary changes to Major Procedures under the jurisdiction of Maintenance, Instrumentation and Control, Reactor Engineering, Chemistry, or Health Physics which do not change the intent or generate an unreviewed safety question, changes may be made upon approval of the Cognizant Group Leader and Call Superintendent."

It also states

"All temporary or permanent changes to Minor Operating Procedures (checkoff lists, alarm responses, data sheets, operating instructions, etc.) shall be approved by the Shift Supervisor, and shall be subsequently reviewed and approved by the Operations PSRC Subcommittee. All temporary or permanent changes to other Minor Procedures under the jurisdiction of Maintenance, Instrumentation and Control, Reactor Engineering, Chemistry, or Health Physics shall be approved by a Cognizant Group Leader and shall be subsequently reviewed and approved by the appropriate PSRC Subcommittee."

The above statements might be interpreted to require organizations other than those listed such as Results Engineering, Security, and Training to have the Shift Supervisor approve procedure change forms for procedures under their jurisdiction. This is not the intent of this technical specification section.

The intent of this section was to take exception to ANSI N18.7 which requires a Senior Reactor Operator (SRO) signature on all Temporary Changes. The intent was to only require this for Operations group procedures. For other groups, the group leader and call superintendent (PSRC subcommittee for minor) are the only required approval authorities. This was done to minimize the administrative burden placed on the Shift Supervisor/Supervising Operator. This proposed change to the Technical Specifications is administrative in nature and is intended only to clarify the approval process for plant procedures.

Also included in this revision are corrections to Section 3.3 to reflect the transfer of the requirements in Section 3.11 to the Offsite Dose Calculation Manual. References to Section 3.11.2.1 and Table 4.11-2 were mistakenly left unchanged. This change is editorial in nature and reflects the changes made previously in an approved License Amendment 42.

In addition, Technical Specification Section 6.5.1.2, Plant Safety Review Committee-Composition, is revised to reflect a position title change from Manager Nuclear Plant Engineering Wolf Creek to Manager System Engineering. This title change reflects a restructuring of the engineering support function to provide increased emphasis on engineering support for issues related to plant operation and maintenance. This change does not involve a change in the current Plant Safety Review Committee membership.

These proposed revisions do not change the operating procedures of the plant or the administrative controls for them. They also do not include any changes to plant equipment or systems. Therefore, based on the above discussions and the considerations presented in Attachment II, the proposed changes do 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 the 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 changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

ATTACHMENT II

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Significant Hazards Consideration Determination

The proposed changes would revise Technical Specification Section 6.8 to clarify the approval process for plant procedures, Section 3.3 to reflect the relocation of the Radiological Effluent Technical Specification (RETS) to Offsite Dose Calculation Manual (ODCM), and section 6.5.1.2 to reflect a modification in a position title.

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

The clarification of the wording for the approval process for plant procedures does not change the method of approval or the intent of the process. Therefore approval of plant procedures continues to be given by cognizant individuals and does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Changes to a technical specification to reflect the relocation of the RETS to the ODCM does not change requirements or reduce the clarity of the specification.

The information is readily available in the ODCM and the placement of this information in the ODCM has already been approved by the U.S. Nuclear Regulatory Commission in License Amendment 42.

The change to one of the position titles listed in Section 6.5.1.2 does not involve any change in the current membership of the Plant Safety Review Committee. This title change reflects a restructuring of the engineering support function to provide increased emphasis on engineering support for issues related to plant operation and maintenance.

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

These changes do not involve any change to the installed plant systems or the operating procedures of WCS. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Standard 3 - Involve a Significant Reduction in the Margin of Safety

Clarifying the intent of the approval process for plant procedures does not change the method of approval or the process by which they are reviewed to ensure the safety of the public and the plant. The editorial correction to Section 3.3 and the change to a position title in Section 6.5.1.2 are administrative in nature and do not impact any margin of safety. Therefore the proposed changes do not involve a significant reduction in the margin of safety.

Based on the above discussion, 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 the margin of safety. The requested license amendment does not involve a significant hazards consideration.

ATTACHMENT III
ENVIRONMENTAL IMPACT DETERMINATION

Environmental Impact Determination

10 CFR 51.22(b) specifies the criteria for categorical exclusions from the requirement for a specific environmental assessment per 10 CFR 51.21. This amendment request meets the criteria specified in 10 CFR 51.22(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 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 requested license amendment involves no change to the facility or operating procedures, therefore no increase in the amounts of effluents or new types of effluents would result.

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

The nature of the changes is administrative and does not create additional exposure to personnel nor affect levels of radiation present. The proposed changes do not result in significant individual or cumulative occupational radiation exposure.

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