

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan  
Vice President Nuclear Assurance

September 22, 1992

NA 92-0054

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  
Section 6.0 - Organization and Position Title Changes

Gentlemen:

This letter is to transmit an application for amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station (WCGS), Unit 1. This license amendment request proposes revising Technical Specification Section 6.0 to reflect changes to Wolf Creek Nuclear Operating Corporation (WCNOC) organization and position titles.

Attachment I provides a safety evaluation along with a detailed description of the proposed change. Attachment II provides a significant hazards consideration determination and Attachment III provides an environmental impact determination. The specific changes to the technical specifications proposed by this request are 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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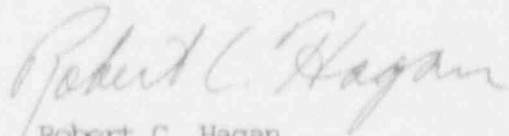
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If you have any questions concerning this matter, please contact me or Mr. Kevin J. Moles of my staff.

Very truly yours,



Robert C. Hagan  
Vice President  
Nuclear Assurance

RCH/llb

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  
J. L. Milhoan (NRC), w/a  
G. A. Pick (NRC), w/a  
W. D. Reckley (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 22<sup>nd</sup> day of Sept, 1992.



Mary E. Gifford  
Notary Public

Expiration Date 12/09/95

ATTACHMENT I  
SAFETY EVALUATION

## SAFETY EVALUATION

### Proposed Change

The purpose of the proposed Technical Specification changes is to revise Section 6.0 to reflect an organizational change and various title changes in the Wolf Creek Nuclear Operating Corporation (WCNOC) organization.

### Evaluation

The title of Vice President Operations in Technical Specification Sections 6.5.1.6 and 6.5.1.8 is being changed to Vice President Plant Operations. This title change is administrative in nature and does not represent any change in reporting relationships, job responsibilities, or overall organizational commitments.

The title of Director Plant Operations in Technical Specification Sections 6.1.1, 6.2.1b., 6.5.1.1, 6.5.1.6, 6.5.1.7, 6.8.1, 6.8.2, 6.8.3, 6.13 and 6.14 is being changed to Vice President Plant Operations. This title change reflects a restructuring of the operations department to provide increased emphasis on plant operations.

Section 6.5.1.7c, will be revised to indicate that in the event of disagreement between the Plant Safety Review Committee and the Vice President Plant Operations that the President and Chief Executive Officer, rather than the Vice President Operations, shall be provided written notification within 24 hours.

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 a possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report; or create a 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 change would revise Technical Specification Section 6.0 to reflect an organizational change and various title changes in the Wolf Creek Nuclear Operating Corporation (WCNOC) organization.

##### STANDARD 1 - Involves a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. These changes involve an administrative change to the WCNOC organization and to position titles and as such, have no effect on plant equipment or the technical qualification of plant personnel.

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

The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. These changes are administrative in nature and do not involve any change to the installed plant systems or the overall operating philosophy of Wolf Creek Generating Station.

##### STANDARD 3 - Involve a Significant Reduction in the Margin of Safety

The proposed changes do not involve a significant reduction in a margin of safety. These changes do not involve any changes in overall organizational commitments. An organizational change and position title changes alone do not reduce any margin of safety.

Based on 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. 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 requirements for a specific environmental assessment per 10 CFR 51.21. This amendment request meets the criteria specified in 10 CFR 51.22(c)(9). The 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 off-site

The requested license amendment involves no change to the facility and does not involve any change in the manner of operation of any plant systems involving the generation, collection or processing of radioactive materials or other types of effluents. Therefore, no increase in the amounts of effluents or new types of effluents would be created.

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

The requested license amendment involves no change to the physical facility and does not involve any change in the manner of operation of any plant systems involving the generation, collection or processing of radioactive materials or other types of effluents. Furthermore, implementation of this proposed change will not involve work activities which could contribute to occupational radiation exposure. Therefore there will be no increase in individual or cumulative occupational radiation exposure associated with this proposed change.

Based on the above it is concluded that there will be no impact on the environment resulting from this change. 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 specific environmental assessment by the Commission.