

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Richard A. Muench
Vice President Engineering

February 17, 1997

ET 97-0003

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Reference: 1) Letter CO 95-0002 dated March 24, 1995, from
R. N. Johannes, WCNOC, to the NRC
2) Letter ET 95-0065 dated August 16, 1995, from
R. C. Hagan, WCNOC, to the NRC
Subject: Docket No. 50-482: Removal of Technical Specification
Table 3.6-1

Gentlemen:

Reference 1 transmitted an application for amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station (WCGS). This license amendment request proposed to revise Technical Specification 1.7, "Containment Integrity," Technical Specification 3/4.6.1, "Containment Integrity," and Technical Specification 3/4.6.3, "Containment Isolation Valves." These proposed changes would remove Technical Specification Table 3.6-1, "Containment Isolation Valves," to Wolf Creek Generating Station (WCGS) procedures. This proposed change is in accordance with the guidance provided in Generic Letter 91-08, "Removal of Component Lists from Technical Specifications," dated May 6, 1991.

Reference 2 submitted corrected Technical Specification markup pages to incorporate wording from Generic Letter 91-08 which had inadvertently been omitted from Reference 1. Also, an additional footnote was added to the changes requested for Technical Specification 3.6.3. This note would have allowed an increased allowed outage time for certain Component Cooling Water System valves to complete testing required to return the valves to OPERABLE status following maintenance. However, after further evaluation WCNOC has decided that the additional footnote is not required, and requests that the submittals provided by the references be withdrawn and superseded by the attached submittal.

A revised Safety Evaluation is provided in Attachment I, and Attachment II provides a revised No Significant Hazards Consideration Determination. Attachment III is the Environmental Impact Determination, and the marked-up technical specification pages for this request are provided in Attachment IV.

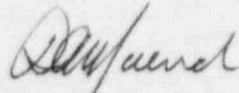
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In accordance with 10 CFR 50.91, a copy of this revision to our original application, with attachments, is being provided to the designated Kansas State Official.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4034, or Mr. Richard D. Flannigan, at extension 4500.

Very truly yours,



Richard A. Muench

RAM/jad

Attachments I - Safety Evaluation
 II - No Significant Hazards Consideration Determination
 III - Environmental Impact Determination
 IV - Proposed Technical Specification Change

cc: V. L. Cooper (KDHE), w/a
L. J. Callan (NRC), w/a
W. D. Johnson (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Richard A. Muench, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering 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 *Richard A. Muench*
Richard A. Muench
Vice President
Engineering

SUBSCRIBED and sworn to before me this 17th day of June, 1997.



Angela E. Wessel
Notary Public

Expiration Date *July 3, 1999*

ATTACHMENT I
SAFETY EVALUATION

Safety Evaluation

Proposed Change

This license amendment request proposes to revise the Wolf Creek Generating Station (WCGS) Technical Specifications to relocate Technical Specification Table 3.6-1, "Containment Isolation Valves," to Wolf Creek Generating Station procedures, which are subject to the change control provisions in the Administrative Controls Section of the Technical Specifications. This request is being made in accordance with the guidance provided in Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications," dated May 6, 1991.

The proposed changes to relocate Technical Specification Table 3.6-1 consist of:

1. Deleting references to the table from Technical Specification 1.7, 3/4.6.1 and 3/4.6.3,
2. Adding wording to Surveillance Requirement 4.6.1.1a to exempt valves opened under administrative control as permitted by Technical Specification 3/4.6.4, and
3. Adding a note to LCO 3.6.3 to indicate that locked or sealed-closed valves may be opened under administrative control.

Bases Section 3/4.6.3 will also be revised in accordance with the guidance provided in GL 91-08.

Background

Maintaining containment integrity prevents excessive radioactivity from passing from the containment to the atmosphere in the event of a release of radioactive material to the containment. Containment integrity is provided by the containment structure and by isolating the various penetrations that pass through the containment structure walls.

The containment isolation valves are part of the containment piping penetration isolation design. The function of these valves is to automatically close, or be able to be closed manually, to limit the release of radioactive fission products to the environment. Technical Specification 3/4.6.3 establishes Technical Specification requirements for containment isolation valves. Technical Specification Table 3.6-1 specifically identifies valves for which operability ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material within the containment or pressurization of the containment.

Generic Letter 91-08, "Removal of Component Lists from Technical Specifications," provides guidance to licensees pursuing amendments to remove component lists from Technical Specifications. In accordance with the provided guidance, component lists removed from technical specifications must be relocated in plant procedures that are subject to the change control provisions in the Administrative Controls Section of the technical specifications. These changes allow component lists to be updated without

license amendments. Technical Specification references to component lists are to be replaced with general statements that describe the types of components to which the requirements apply. Since any change to procedural component lists will be subject to the provisions of Section 50.59 of Title 10 of the Code of Federal Regulations (10 CFR 50.59), adequate controls will exist to ensure that these components satisfy the applicable technical specification requirements.

The proposed change removes Technical Specification Table 3.6-1 in accordance with GL 91-08. Specifications that refer to Table 3.6-1 are revised to reference the applicable valves by function. The proposed changes, as described above, allow Table 3.6-1 to be removed from the technical specifications without altering existing technical specification requirements or those components to which they apply.

Evaluation

Relocation of Table 3.6-1 from the WCGS Technical Specifications to WCGS plant procedures would permit administrative control of changes to the containment isolation valve list. Currently, updating the containment isolation valve list requires prior Commission approval utilizing the license amendment process in accordance with 10 CFR 50.90. Once relocated, any change to the containment isolation valve list contained in plant procedures would be subject to the requirements specified in Administrative Controls, Section 6, of the technical specifications on changes to plant procedures. In addition, containment isolation valves are listed by penetration in Updated Safety Analysis Report (USAR) Figure 6.2.4-1, which identifies each containment penetration and its associated valves and isolation design features. Thus, any change to the containment isolation valve list would constitute a change to the facility, and would be subject to the provisions of 10 CFR 50.59. Therefore, the procedure change control provisions of the technical specifications, and the current administrative controls over changes to the facility as described in the USAR, would provide adequate means to control changes to the valve list, once incorporated into WCGS plant procedures.

As stated in GL 91-08, technical specifications may be stated in terms that describe the types of components to which the requirements apply. This provides an acceptable alternative to identifying individual components by listing their plant identification number in tables of technical specification components. The removal of component lists from the technical specifications does not alter existing technical specification requirements or those components to which they apply and is, therefore, an administrative change.

This technical specification change will cause the LCO remedial actions and surveillance requirements of the technical specifications to apply to all valves classified as containment isolation valves. Containment isolation valves are defined in 10 CFR 50, Appendix A, General Design Criteria 55, 56 and 57, and are individually identified in WCGS licensing basis (USAR Figure 6.2.4-1). WCGS containment isolation valves will be administratively controlled by the requirements of Technical Specification 3/4.6.1 and Technical Specification 3/4.6.3. Future changes to the relocated table and to USAR Figure 6.2.4-1 will be controlled by the 10 CFR 50.59 review process.

This process provides proper levels of review and approval of changes and for the identification of any unreviewed safety question in accordance with 10 CFR 50.59. Records of the changes are maintained and an annual report is submitted to the NRC that includes a brief description of changes and a summary of the safety evaluation of each in accordance with 10 CFR 50.59. Relocation of Table 3.6-1 does not affect the purpose of information provided in USAR Figure 6.2.4-1.

Technical Specification Table 3.6-1 identifies certain valves that may be opened during plant operation as long as the valves are administratively controlled. These valves are required to be opened for testing, maintenance, and other activities. Administrative control of these valves, when opened in Modes 1 through 4, is required since rapid closure would be necessary to isolate the containment during accident conditions. Technical Specification 3/4.6.3 is revised to retain the exception of the requirements to those valves under administrative control. This control is provided by appropriate plant procedures. Any changes to these procedures would be reviewed under 10 CFR 50.59 as described above.

The valve closure time requirements listed in Table 3.6-1 are maintained in appropriate plant procedures, as well as in USAR Figure 6.2.4-1. Any changes to these closure time requirements would be reviewed under the provisions of 10 CFR 50.59, as described above. Therefore, removing Table 3.6-1 from the technical specifications will not alter the valve stroke time requirements.

The proposed revision does not alter current technical specification requirements for containment isolation valve operability. The LCO and Surveillance Requirements would be retained in the revised technical specifications. Therefore, the proposed changes would not affect the meaning, application, and function of the technical specification requirements for the containment isolation valves currently listed in Technical Specification Table 3.6-1.

Based on the above discussions and the no significant hazards consideration determination presented in Attachment II, the proposed change does 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 reduce the margin of safety as defined in the basis for any technical specification. Therefore, the proposed change does not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

ATTACHMENT II

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

No Significant Hazards Consideration Determination

This license amendment request proposes a revision to Technical Specification 3/4.6.3, to remove Table 3.6-1, "Containment Isolation Valves," from the technical specifications, in accordance with the guidance provided in Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications," dated May 6, 1991. The current technical specification requirements concerning containment isolation valves would continue to be maintained under administrative control, in accordance with the revised Technical Specification 3/4.6.3. Additional technical specification sections and Bases sections are revised to remove reference to Table 3.6-1 and to clarify the administrative control requirements, as follows:

1. Deleting references to the table from Technical Specification 1.7, 3/4.6.1 and 3/4.6.3,
2. Adding wording to Surveillance Requirement 4.6.1.1a to exempt valves opened under administrative control as permitted by Technical Specification 3/4.6.4, and
3. Adding a note to LCO 3.6.3 to indicate that locked or sealed-closed valves may be opened under administrative control.

Bases Section 3/4.6.3 will also be revised to reflect the above changes, per the guidance provided in GL 91-08.

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

The proposed changes simplify the technical specifications, meet the regulatory requirements for control of containment isolation, and are consistent with the guidelines of GL 91-08. The procedural details of Technical Specification Table 3.6-1 have not been changed, but only relocated to a different controlling document. The proposed changes are administrative in nature, should result in improved administrative practices, and do not affect plant operations.

The probability of occurrence of a previously evaluated accident is not increased because this change does not introduce any new potential accident initiating conditions. The consequences of an accident previously evaluated is not increased because the ability of containment to restrict the release of any fission product radioactivity to the environment will not be degraded by this change.

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

The proposed changes are administrative in nature, do not result in physical alterations or changes to the operation of the plant, and cause no change in the method by which any safety-related system performs its function. Therefore, this proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

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

The administrative change to relocate Technical Specification Table 3.6-1 to appropriate plant procedures does not alter the basic regulatory requirements for containment isolation and will not adversely affect containment isolation capability for credible accident scenarios. Adequate control of the content of the table is assured by existing plant procedures.

The proposed relocation of Technical Specification Table 3.6-1 does not alter current technical specification requirements for containment isolation valve operability. The LCO and Surveillance Requirements would be retained in the revised technical specifications. Therefore, the proposed change will not affect the meaning, application, and function of the current technical specification requirements for the valves in Table 3.6-1.

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 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) as specified below:

- (i) the amendment involves no significant hazards consideration

As demonstrated in Attachment II, the proposed change 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 proposed change does not involve a change to the facility or operating procedures that would cause an increase in the amounts of effluents or create new types of effluents.

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

The proposed change does not create additional exposure to personnel nor affect levels of radiation present. Also, the proposed change does not result in any increase in individual or cumulative occupational radiation exposure.

Based on 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 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.21 relative to requiring a specific environmental assessment by the Commission.

ATTACHMENT IV

PROPOSED TECHNICAL SPECIFICATION CHANGES