

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

February 26, 1988

WM 88-0057

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Subject: Docket No. 50-482: Revision to Organization  
Technical Specifications

Gentlemen:

The purpose of this letter is to transmit an application for amendment to Facility Operating License No. NPP-42 for Wolf Creek Generating Station, Unit No. 1. This license amendment request proposes revising Technical Specification Figures 6.2-1, 6.2-2, and Section 6.5.1.2 which address the Wolf Creek Nuclear Operating Corporation Organization.

A complete Safety Evaluation and Significant Hazards Consideration are provided as Attachments I and II respectively. The proposed changes to the Technical Specifications are provided in Attachment III (marked-up) and Attachment IV (typed).

In accordance with 10 CFR 50.91, a copy of this application, with attachments is being provided to the designated Kansas state official. Enclosed is a check (No. 10062) for the \$150.00 application fee required by 10 CFR 170.21.

The proposed revision to the Wolf Creek Generating Station Technical Specifications will be fully implemented within 30 days of formal Nuclear Regulatory Commission approval.

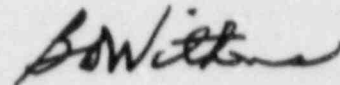
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If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,



Bart D. Withers  
President and  
Chief Executive Officer

BDW/jad

Enclosure

Attachments:     I - Safety Evaluation  
                  II - Significant Hazards Consideration  
                  III - Proposed Technical Specification Change (marked-up)  
                  IV - Proposed Technical Specification Change (typed)

cc: G. Allen (KDHE), w/a  
     B. L. Bartlett (NRC), w/a  
     R. D. Martin (NRC), w/a  
     P. W. O'Connor (NRC), 2 w/a

STATE OF KANSAS       )  
                              ) SS  
COUNTY OF COFFEY     )

Bart D. Withers, of lawful age, being first duly sworn upon oath says that he is President and Chief Executive Officer 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 *B D Withers*  
Bart D. Withers  
President and Chief Executive Officer

SUBSCRIBED and sworn to before me this 24 day of February, 1988.

*Marlene Heathman*  
Notary Public

Expiration Date *August 4, 1990*



ATTACHEMENT I

### SAFETY EVALUATION

This amendment revises Wolf Creek Generating Station (WCGS), Unit No. 1, Technical Specifications Section 6.5.1.2, which addresses the composition of the Plant Safety Review Committee, Figure 6.2-1, which addresses the Operating Corporation Organization, and Figure 6.2-2, which addresses the Operations Division Organization.

The first set of requested revisions involve changes to titles in Figure 6.2-2. The titles of Superintendent of Maintenance; Superintendent of Operations; Superintendent of Technical Support; and Superintendent of Plant Support are being changed to the Manager of Maintenance and Modifications; Manager of Operations; Manager of Technical Support; and the Manager of Plant Support respectively.

The title of Operations Coordinator - Operations is being changed to the Operations Supervisor, and the title of Operations Coordinator - Projects and the Engineering/Specialist currently under the Operations Coordinator - Projects and Planning is being changed to the Projects group.

Additional title changes are being made to T.S. Figure 6.2-1 and T.S. Section 6.5.1.2. The title Superintendent Quality Control is being changed to the Manager Quality Control in Figure 6.2-1. The title Instrument and Control Supervisor is being changed to the Manager Instrumentation and Controls.

These title changes are only administrative in nature and do not represent any change in reporting relationships or reduction in job responsibilities, relationships or overall organizational commitments.

The second set of requested revisions involve changes in reporting relationships shown on T.S. 6.2-2. The Outage Manager, previously reporting to the Vice-President Nuclear Operations, will be reporting directly to the Plant Manager and be included in T.S. Figure 6.2-2. This change increases organizational effectiveness by providing the Plant Manager direct supervision of outage activities.

Fire Protection, previously reporting to the Superintendent of Plant Support, will be reporting to the Operations Support Supervisor under the Manager of Operations. This change will provide better control and better response to the concerns of Fire Protection, and does not effect overall organizational commitments.

Health Physics, previously reporting to the Superintendent of Plant Support, will be reporting to the Manager of Technical Support. This is only a change in reporting relationship and has no effect on job responsibilities.

Compliance, previously reporting to the Superintendent of Regulatory, Quality, and Administrative Services, will be reporting to the Manager of Plant Support. This is only a revision of reporting relationships and does not effect job responsibilities.

Administration, previously reporting to the Superintendent of Regulatory, Quality, and Administrative Services, will be reporting to the Manager of Plant Support. This is only a revision of reporting relationships and does not effect job responsibilities.

Emergency Planning will be removed from T.S. Figure 6.2-2. Emergency Planning will be reporting through Health Physics. This relationship should prove to be a more efficient structure.

These reporting relationship changes represent organizational enhancements and do not constitute changes in overall organizational commitments.

The third set of requested revisions involve positions and organizations that have been removed from T.S. Figures 6.2-1 or 6.2-2. The position of Superintendent Regulatory, Quality, and Administrative Services, currently shown on Figure 6.2-2, is being deleted. The responsibilities of this position will be assigned to the Manager of Plant Support. This change represents an organizational restructuring and does not effect overall organizational commitments.

Document Control, currently reporting to the Superintendent of Regulatory, Quality, and Administrative Services as shown on Figure 6.2-2, is being consolidated with the Document Control group reporting to the Manager Management Systems. The Manager Management Systems reports to the Vice-President Engineering and Technical Services as shown on Figure 6.2-1. This will increase organizational effectiveness by consolidating two departments with similar responsibilities.

Engineering and Technical Services Support, currently shown on Figure 6.2-1, is being deleted. The responsibilities of Engineering and Technical Services Support are being divided between the remaining departments under the Vice-President Engineering and Technical Services. This change is an organizational restructuring and will not change overall organizational commitments.

The Manager Facilities and Modifications, currently shown on Figure 6.2-1 reporting to the Vice-President Engineering and Technical Services, is being deleted. Facilities and Modifications is being consolidated with the Maintenance organization shown on Figure 6.2-2 reporting to the Manager of Maintenance and Modifications. This change will increase organizational effectiveness by consolidating two departments with similar responsibilities.

The fourth set of requested revisions involve to the Technical Specifications involve changes in responsibilities. The Maintenance Services Supervisor, currently reporting to the Superintendent of Maintenance in T.S. Figure 6.2-2, is being replaced by Maintenance Engineering and Maintenance Planning. This revision will enhance organizational effectiveness by allowing both the Maintenance Planning and Maintenance Engineering, previously reporting to the Maintenance Services Supervisor, to report directly to the Manager of Maintenance and Modifications.



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The Maintenance Support Supervisor, currently reporting to the Superintendent of Maintenance in T.S. Figure 6.2-2, is being replaced by Electrical Maintenance and Mechanical Maintenance. This revision will enhance organizational effectiveness by allowing both Electrical Maintenance and Mechanical Maintenance, previously reporting to the Maintenance Support Supervisor, to report directly to the Manager of Maintenance and Modifications.

The fifth set of requested revisions involve changes to the Plant Safety Review Committee (PSRC) composition as shown in T.S. Section 6.5.1.2. T.S. Section 6.5.1.2 is being revised to reflect the assignment of the Manager of Plant Support as the PSRC Chairman and the removal of the Plant Manager from the PSRC. This change is intended to provide effective oversight of all PSRC activities. T.S. 6.5.1.2 is also being revised to reflect the deletion of the Superintendent of Regulatory, Quality and Administrative Services and the title changes for the other Superintendent positions and the Supervisor Instrument and Control shown in Section 6.5.1.2. This revision does not change overall organizational commitments.

The proposed revisions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety evaluated previously in the Safety Analysis Report. These changes involve only organizational enhancements and therefore have no effect on plant equipment or the technical qualifications of plant personnel.

The proposed revisions do not create the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report. These changes involve revising nomenclature and reporting relationships and as such, do not affect the overall number or qualifications of personnel who operate Wolf Creek Generating Station, nor do they involve any changes to plant systems or the overall operating philosophy of Wolf Creek Generating Station.

The proposed revisions do not reduce the margin of safety as defined in the basis for any technical specification. These revisions do not involve any changes in overall organizational commitments. Organizational enhancements alone do not reduce any margin of safety.

Based on the above discussions and the considerations presented in Attachment II, the proposed revisions to the WCGS Technical Specifications 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 reduce the margin of safety as defined in the basis for any technical specification. Therefore, the proposed revisions do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

ATTACHMENT II



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### SIGNIFICANT HAZARDS CONSIDERATION

This amendment revises Wolf Creek Generating Station (WCGS), Unit No. 1, Technical Specifications Section 6.5.1.2, which addresses the composition of the Plant Safety Review Committee, Figure 6.2-1, which addresses the Operating Corporation Organization, and Figure 6.2-2, which addresses the Operations Division Organization.

The first set of requested revisions involve changes to titles in Figure 6.2-2. The titles of Superintendent of Maintenance; Superintendent of Operations; Superintendent of Technical Support; and Superintendent of Plant Support are being changed to the Manager of Maintenance and Modifications; Manager of Operations; Manager of Technical Support; and the Manager of Plant Support respectively.

The title of Operations Coordinator - Operations is being changed to the Operations Supervisor, and the title of Operations Coordinator - Projects and Planning is being changed to the Operations Support Supervisor. The title of the Engineering/Specialist currently under the Operations Coordinator - Projects and Planning is being changed to the Projects group.

Additional title changes are being made to T.S. Figure 6.2-1 and T.S. Section 6.5.1.2. The title Superintendent Quality Control is being changed to the Manager Quality Control in Figure 6.2-1. The title Instrument and Control Supervisor is being changed to the Manager Instrumentation and Controls.

These title changes are only administrative in nature and do not represent any change in reporting relationships or reduction in job responsibilities, relationships or overall organizational commitments.

The second set of requested revisions involve changes in reporting relationships shown on T.S. 6.2-2. The Outage Manager, previously reporting to the Vice-President Nuclear Operations, will be reporting directly to the Plant Manager and be included in T.S. Figure 6.2-2. This change increases organizational effectiveness by providing the Plant Manager direct supervision of outage activities.

Fire Protection, previously reporting to the Superintendent of Plant Support, will be reporting to the Operations Support Supervisor under the Manager of Operations. This change will provide better control and better response to the concerns of Fire Protection, and does not effect overall organizational commitments.

Health Physics, previously reporting to the Superintendent of Plant Support, will be reporting to the Manager of Technical Support. This is only a change in reporting relationship and has no effect on job responsibilities.

Compliance, previously reporting to the Superintendent of Regulatory, Quality, and Administrative Services, will be reporting to the Manager of Plant Support. This is only a revision of reporting relationships and does not effect job responsibilities.

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Administration, previously reporting to the Superintendent of Regulatory, Quality, and Administrative Services, will be reporting to the Manager of Plant Support. This is only a revision of reporting relationships and does not effect job responsibilities.

Emergency Planning will be removed from T.S. Figure 6.2-2. Emergency Planning will be reporting through Health Physics. This relationship should prove to be a more efficient structure.

These reporting relationship changes represent organizational enhancements and do not constitute changes in overall organizational commitments.

The third set of requested revisions involve positions and organizations that have been removed from T.S. Figures 6.2-1 or 6.2-2. The position of Superintendent Regulatory, Quality, and Administrative Services, currently shown on Figure 6.2-2, is being deleted. The responsibilities of this position will be assigned to the Manager of Plant Support. This change represents an organizational restructuring and does not effect overall organizational commitments.

Document Control, currently reporting to the Superintendent of Regulatory, Quality, and Administrative Services as shown on Figure 6.2-2, is being consolidated with the Document Control group reporting to the Manager Management Systems. The Manager Management Systems reports to the Vice-President Engineering and Technical Services as shown on Figure 6.2-1. This will increase organizational effectiveness by consolidating two departments with similar responsibilities.

Engineering and Technical Services Support, currently shown on Figure 6.2-1, is being deleted. The responsibilities of Engineering and Technical Services Support are being divided between the remaining departments under the Vice-President Engineering and Technical Services. This change is an organizational restructuring and will not change overall organizational commitments.

The Manager Facilities and Modifications, currently shown on Figure 6.2-1 reporting to the Vice-President Engineering and Technical Services, is being deleted. Facilities and Modifications is being consolidated with the Maintenance organization shown on Figure 6.2-2 reporting to the Manager of Maintenance and Modifications. This change will increase organizational effectiveness by consolidating two departments with similar responsibilities.

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The fifth set of requested revisions involve changes to the Plant Safety Review Committee (PSRC) composition as shown in T.S. Section 6.5.1.2. T.S. Section 6.5.1.2 is being revised to reflect the assignment of the Manager of Plant Support as the PSRC Chairman and the removal of the Plant Manager from the PSRC. This change is intended to provide effective oversight of all PSRC activities. T.S. 6.5.1.2 is also being revised to reflect the deletion of the Superintendent of Regulatory, Quality and Administrative Services and the title changes for the other Superintendent positions and the Supervisor Instrument and Control shown in Section 6.5.1.2. This revision does not change overall organizational commitments.

The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing examples of amendments that are not likely to involve Significant Hazards Consideration (51 FR 7751). Among those examples are, "A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the Technical Specifications, corrections of an error, or a change in nomenclature" and "A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications..."

The proposed revisions do not involve a significant increase in the probability or consequences of an accident previously evaluated. These changes involve organizational modifications and enhancements and as such, have no effect of plant equipment or the technical qualifications of plant personnel.

The proposed revisions do not create the possibility of a new or different kind of accident from any accident previously evaluated. These changes do not affect the qualifications of personnel who operate Wolf Creek Generating Station, nor do they involve any change to the installed plant systems or the overall operating philosophy of Wolf Creek Generating Station.

The proposed revisions do not involve a significant reduction in a margin of safety. These changes do not involve any changes in overall organizational commitments. Organizational enhancements alone do not reduce any margin of safety.

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Based on the above discussions and those presented in Attachment I, it has been determined that the requested Technical Specification revisions do 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 over previous evaluations; or involve a significant reduction in a margin of safety. Therefore, the requested license amendment does not involve a significant hazards consideration.



ATTACHMENT III