

WOLF CREEK NUCLEAR OPERATING CORPORATION

Clay C. Warren
Vice President Operations Support

MAR 23 2001

CO 01-0013

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

Subject: Docket No. 50-482: Deletion of Operating License Section 2.F, Deletion of License Conditions, and Revision to Technical Specification Table 5.5.9-2

Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOC) herewith transmits an application for amendment to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS).

This amendment application proposes to delete Section 2.F of the Operating License which requires reporting any violations of the requirements contained in Section 2.C of the license. Additionally, License Conditions 2.C.(4), 2.C.(6), 2.C.(7), 2.C.(8), 2.C.(9), 2.C.(10), 2.C.(11), 2.C.(12), 2.C.(13), and 2.C.(14) are being deleted as these conditions are obsolete or adequately described elsewhere.

The proposed change to delete Section 2.F is administrative in nature and will eliminate notification and reporting requirements from the Facility Operating License which is adequately governed by the reporting requirements of 10 CFR 50.72 and 10 CFR 50.73. Furthermore, the change will reduce unnecessary regulatory burden and allow WCNOC to take advantage of the revision to 10 CFR 50.73 that allows for Licensee Event Reports to be submitted within 60 days instead of 30 days as required by the current Section 2.F.

Additionally, this application proposes to revise Technical Specification Table 5.5.9-2, "Steam Generator Tube Inspection," to delete the requirement to notify the NRC pursuant to 10 CFR 50.72(b)(2) if the steam generator tube inspection results in a C-3 classification.

The WCNOC Plant Safety Review Committee and the Nuclear Safety Review Committee have reviewed this amendment application. Attachments I through VI provide the required affidavit, description of proposed license changes and assessment, existing marked-up Operating License pages, existing marked-up Technical Specification page, revised Technical Specification page, and summary of regulatory commitments made in this submittal.

A001

WCNOC requests approval of the proposed license amendment by October 31, 2001, with the amendment being implemented within 30 days of issuance of the license amendment. The approval date was administratively selected to allow for NRC review, but WCNOC does not require this amendment to allow continued safe full power operation.

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92. Pursuant to 10 CFR 51.22(b), no environmental assessment need be prepared in connection with the issuance of this amendment.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Kansas State Official. If you should have any questions regarding this submittal, please contact me at (620) 364-4034, or Mr. Tony Harris at (620) 364-4038.

Very truly yours,



Clay C. Warren

CCW/rlr

Attachments: I - Affidavit
 II - Description and Assessment
 III - Markup of Operating License
 IV - Markup of Technical Specification page
 V - Retyped Technical Specification page
 VI - List of Commitments

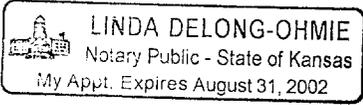
cc: V. L. Cooper (KDHE), w/a
 J. N. Donohew (NRC), w/a
 W. D. Johnson (NRC), w/a
 E. W. Merschoff (NRC), w/a
 Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Clay C. Warren, of lawful age, being first duly sworn upon oath says that he is Vice President Operations Support of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the contents thereof; that he has executed the 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 Clay C. Warren
Clay C. Warren
Vice President Operations Support

SUBSCRIBED and sworn to before me this 23 day of March, 2001.



Linda DeLong-Ohmie
Notary Public

Expiration Date August 31, 2002

ATTACHMENT II
DESCRIPTION AND ASSESSMENT

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

- 1.1 This proposed License Amendment Request (LAR) is a request pursuant to 10 CFR 50.90 to delete Section 2.F of the Wolf Creek Generating Station (WCGS), Unit No. 1, Facility Operating License and License Conditions 2.C.(4), 2.C.(6), 2.C.(7), 2.C.(8), 2.C.(9), 2.C.(10), 2.C.(11), 2.C.(12), 2.C.(13), and 2.C.(14).

Additionally, this application proposes to revise Technical Specification Table 5.5.9-2, "Steam Generator Tube Inspection," to delete the requirement to notify the NRC pursuant to 10 CFR 50.72(b)(2) if the steam generator tube inspection results in a C-3 classification.

- 1.2 Updated Safety Analysis Report (USAR) Section

There are no changes to the USAR currently anticipated as a result of this LAR.

2.0 DESCRIPTION

The proposed License Amendment would delete Section 2.F of the WCGS, Unit No. 1, Facility Operating License which requires reporting any violations of the requirements contained in Section 2.C of the license. Additionally, the below License Conditions are being deleted as these conditions are obsolete or adequately described elsewhere.

- 2.C.(4) Environmental Qualification (Section 3.11, SSER #4, Section 3.11, SSER #5)
- 2.C.(6) Qualification of Personnel (Section 13.1.2, SSER #5, Section 18, SSER #1)
- 2.C.(7) NUREG-0737 Supplement 1 Conditions (Section 22, SER)
- 2.C.(8) Post-Fuel-Loading Initial Test Program (Section 14, SER Section 14, SSER #5)
- 2.C.(9) Inservice Inspection Program (Sections 5.2.4 and 6.6, SER)
- 2.C.(10) Emergency Planning
- 2.C.(11) Steam Generator Tube Rupture (Section 15.4.4, SSER #5)
- 2.C.(12) LOCA Reanalysis (Section 15.3.7, SSER #5)
- 2.C.(13) Generic Letter 83-28
- 2.C.(14) Surveillance of Hafnium Control Rods (Section 4.2.3.1 (10), SER and SSER #2)

Technical Specification Table 5.5.9-2, "Steam Generator Tube Inspection," is revised to delete the requirement to notify the NRC pursuant to 10 CFR 50.72(b)(2) if the steam generator tube inspection results in a C-3 classification.

3.0 BACKGROUND

The WCGS Unit 1 Facility Operating License No. NPF-42 was issued on June 4, 1985. The license was issued with conditions containing various requirements to be completed by specified dates or prior to exceeding specified power levels. These activities have been completed and the license conditions are either obsolete or no longer needed.

Operating License Section 2.F, provides for initial notification to be made within 24 hours with written follow-up within thirty days in accordance with the procedures described in 10 CFR 50.73 of any violations of requirements contained in Section 2.C of the Facility Operating License. The Nuclear Regulatory Commission's requirements for immediate notification with written follow-up requirements (Licensee Event Reports) of events at operating nuclear power reactors are stated in 10 CFR 50.72 (Reference 7.1) and 10 CFR 50.73 (Reference 7.2). Thus, the requirements of Operating License Section 2.F are adequately governed by the requirements of 10 CFR 50.72 and 10 CFR 50.73.

License Conditions 2.C.(4), 2.C.(6), 2.C.(7), 2.C.(8), 2.C.(9), 2.C.(10), 2.C.(11), 2.C.(12), 2.C.(13), and 2.C.(14) are conditions that have been completed and are considered obsolete.

Technical Specification Table 5.5.9-2, "Steam Generator Tube Inspection," requires notification to the NRC pursuant to 10 CFR 50.72(b)(2) if the results of the steam generator tube inspection identify more than 10% of the total tubes inspected are degraded tubes or more than 1% of the inspected tubes are defective (Category C-3). On October 25, 2000, the NRC issued a final rule (Reference 7.3) that amended the event reporting requirements for nuclear power reactors to reduce or eliminate the unnecessary reporting burden associated with events of little or no safety significance. Prior to the final rule, 10 CFR 50.72(b)(2)(i) required a four hour report for any event found while the reactor is shutdown, that , had it been found while the reactor was in operation, would have resulted in the nuclear power plant, including its principle safety barriers, being seriously degraded or being in an unanalyzed condition that significantly compromises plant safety. The final rule revised section (b)(2) of the regulation to only apply to initiation of a plant shutdown required by the Technical Specifications. Under the final rule, 10 CFR 50.72(b)(3)(ii) specifies an eight hour reporting requirement for a principle safety barrier being significantly degraded or the plant being in an unanalyzed condition. NUREG-1022, Revision 2, "Event Reporting Guidelines 10 CFR 50.72 and 50.73," Section 3.2.4 identifies serious steam generator tube degradation as an example of a reportable event or condition under 10 CFR 50.72(b)(3)(ii).

4.0 TECHNICAL ANALYSIS

Deletion of Operating License Section 2.C

Operating License Section 2.C lists conditions regarding Maximum Power Level, Technical Specifications, Antitrust Conditions, Fire Protection, Additional Conditions, and other conditions that are proposed for deletion. Operating License Section 2.F requires that Wolf Creek Nuclear Operating Corporation (WCNOC) notify the NRC Operations Center via the Emergency Notification System of violations of the requirements in Section 2.C within 24 hours and with

written followup within thirty days in accordance with the procedures described in 10 CFR 50.73. The requirements of Section 2.F of the license are adequately addressed by the reporting requirements identified in 10 CFR 50.72 and 10 CFR 50.73. As such, Operating License Section 2.F is not required.

Section 2.F of the license can be deleted for the following reasons:

- Deviations from the conditions regarding Maximum Power Level, Technical Specifications, Fire Protection, and Additional Conditions are adequately addressed by the requirements of 10 CFR 50.72 and 10 CFR 50.73.
- The condition regarding Antitrust is an administrative issue and has no safety significance. Consequently, it is not relevant to the proposed elimination of the reporting and notification requirements in Condition 2.G.

The following provides the justification for deletion of the specified License Conditions in Section 2.C of the Operating License.

Deletion of Specific License Conditions

2.C.(4) Environmental Qualification (Section 3.11, SSER #4, Section 3.11, SSER #5)

All electrical equipment within the scope of 10 CFR 50.49 shall be qualified by November 30, 1985.

Justification for Deletion

Letter SLNRC 85-24, dated November 29, 1985, notified the NRC that the electrical equipment required to be qualified under 10 CFR 50.49 has been evaluated and determined to be qualified to the provisions of 10 CFR 50.49. Letter SLNRC 86-002, dated January 17, 1986, provided a final report on the independent review of environmental qualification programs. The NRC responded by letter dated March 17, 1986, indicating that the staff finds that License Condition 2.c.(4) has been fulfilled.

USAR Section 3.11(B), "Environmental Design of Mechanical and Electrical Equipment," provides information on the environmental conditions and design bases for which the mechanical, instrumentation, and electrical portions or the engineered safety features, the reactor protection systems, and other safety-related systems are designed to ensure acceptable performance during normal and design basis accident environmental conditions. As such, changes to the environmental qualification of the equipment specified in the USAR would be reviewed in accordance with 10 CFR 50.59. The requirements of this license condition have been met and are, therefore, proposed to be deleted.

2.C.(6) Qualification of Personnel (Section 13.1.2, SSER #5, Section 18, SSER #1)

The Operating Corporation shall have on each shift operators who meet the requirements described in Attachment 2.

Justification for Deletion

Attachment 2 states, in part:

"The Operating Corporation shall have a licensed senior operator on each shift who has had at least six months of hot operating experience on a same type plant, including at least six weeks at power levels greater than 20% of full power, and who has had startup and shutdown experience. The NRC shall be notified at least 30 days prior to the date the Operating Corporation proposes to release the advisors from further service."

Letter KMLNRC 85-255, dated November 19, 1985, notified the NRC of the intent to release the shift advisors from further service on December 20, 1985. This license condition concerned having additional shift advisors on shift during initial plant criticality and operation. Technical Specification 5.3 and USAR Chapter 13 provides the shift staffing and qualification requirements for operations personnel. Since WCGS has been in operation since 1985, the requirements of this license condition have been completed and are, therefore, proposed to be deleted.

2.C.(7) NUREG-0737 Supplement 1 Conditions (Section 22, SER)

The Operating Corporation shall complete the requirements described in Attachment 3 to the satisfaction of the NRC. These conditions reference the appropriate items in Section 22, "TMI Action Plan Requirements for Applicants for Operating Licenses," in the Safety Evaluation Report and Supplements 1, 2, 3, 4, and 5 of NUREG-0881. Provided below are the requirements specified in Attachment 3:

(1) Functional and Task Analysis (I. C.1, SSER #5)

Prior to startup following the first refueling outage, the Operating Corporation shall submit for staff review and approval, a description of the process used to complete the functional and task analysis, including a description and justification for all information and control deviations from the Westinghouse Owners Group Emergency Response Guidelines, Revision 1.

(2) Emergency Response Capabilities (Generic Letter 82-33, Supplement 1 to NUREG-0737)

Prior to restart following the first refueling outage, the Operating Corporation shall have a fully functional Technical Support Center and Emergency Operations Facility and a fully operable Emergency Response Facility and a fully operable Emergency Response Facilities Information System (ERFIS).

(3) Regulatory Guide 1.97 (Section 7.5.2.3, SSER #3)

Prior to restart following the first refueling outage, the Operating Corporation shall have installed and operable the following instrumentation.

- (a) Source range instrumentation qualified to post-accident conditions
- (b) Reactor vessel water level instrumentation

- (c) Subcooling monitors
- (d) Radiation monitors for releases from steam generator safety/relief valves or atmospheric dump valves, and
- (e) Auxiliary feedwater pump turbine exhaust monitor

Justification for Deletion

(1) Functional and Task Analysis (I. C.1, SSER #5)

NRC letter dated December 2, 1986, provided the results of the NRC review of the process used to complete the functional and task analysis, including a description and justification for all information and control deviations from the Westinghouse Owners Group Emergency Response Guidelines, Revision 1. The NRC concluded that the procedural changes adopted at the WCGS provide adequate guidance and information to the operator to cope with emergencies and achieve the pertinent objectives of the Westinghouse Emergency Response Guidelines.

(2) Emergency Response Capabilities (Generic Letter 82-33, Supplement 1 to NUREG-0737)

NRC letter dated July 31, 1989 concluded that the requirements of this license condition were met based on the staff's review of letter KMLNRC 86-235, dated December 15, 1986, and on past emergency preparedness inspections and related exercises conducted at the site that made use of the Technical Support Center, the Emergency Operations Facility and the Emergency Response Facility Information System.

(3) Regulatory Guide 1.97 (Section 7.5.2.3, SSER #3)

NRC letter dated July 5, 1989 concludes that the response to the license condition is acceptable based on NRC Inspection Report 88-73, dated December 23, 1999, and the staff's review of letter KMLNRC 86-236, dated December 15, 1986.

Based on the above information, the requirements of this license condition have been completed and are, therefore, proposed to be deleted.

2.C.(8) Post-Fuel-Loading Initial Test Program (Section 14, SER Section 14, SSER #5)

Any changes in the Initial Test Program described in Section 14 of the FSAR made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

Justification for Deletion

This license condition is obsolete since the Initial Test Program is complete and the unit is currently in operation in Cycle 12.

2.C.(9) Inservice Inspection Program (Sections 5.2.4 and 6.6, SER)

By December 11, 1985, KG&E shall submit for staff review and approval, the inservice inspection program which conforms to the ASME Code in effect on March 11, 1984.

Justification for Deletion

Letter KMLNRC 85-187, dated July 29, 1985, provided the WCGS Inservice Testing Program for pumps and valves. Letter KMLNRC 85-269, dated December 11, 1985, provided the WCGS Inservice Inspection Program Plan. The requirements of this license condition are considered complete and are, therefore, proposed to be deleted.

2.C.(10) Emergency Planning

In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule, 44 CFR Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of emergency preparedness, the provisions of 10 CFR Section 50.54(s)(2) will apply.

Justification for Deletion

Facility Operating License No. NPF-42 for WCGS, Section 2.C, states in part:

"This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter 1 and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect;"

10 CFR Chapter 1 includes Part 50, "Domestic licensing of production and utilization facilities," and as such, indicates that 10 CFR Section 50.54(s) is currently applicable to WCGS. This license condition is duplicative of requirements that are currently applicable and enforceable. Deletion of this license condition would not result in a reduction of requirements and is, therefore, proposed to be deleted.

2.C.(11) Steam Generator Tube Rupture (Section 15.4.4, SSER #5)

Prior to restart following the first refueling outage, the Operating Corporation shall submit for NRC review and approval an analysis which demonstrates that the steam generator single-tube rupture (SGTR) analysis presented in the FSAR is the most severe case with respect to the release of fission products and calculated doses. Consistent with the analytical assumptions, the licensee shall propose all necessary changes to Appendix A to this license.

Justification for Deletion

Letter SLNRC 86-001, dated January 8, 1986, transmitted a report which demonstrated that the SGTR analysis presented in the FSAR is the most severe case with respect to release of fission products and calculated doses. Letter KMLNRC 86-210, dated December 7, 1986, submitted a license amendment request to incorporate a limiting condition for operation and surveillance requirements into the technical specifications for the steam generator atmospheric relief valves to assure the availability of mitigating equipment assumed in the SGTR analysis. Amendment

No. 30, dated April 20, 1989, approved the changes to the technical specifications. NRC letter dated May 7, 1991 provided a Safety Evaluation associated with the SGTR analysis. The results of the SGTR analysis are described in Chapter 15 of the USAR. As such, changes to the analysis described in the USAR would be reviewed in accordance with 10 CFR 50.59. The requirements of this license condition have been met and are, therefore, proposed to be deleted.

2.C.(12) LOCA Reanalysis (Section 15.3.7, SSER #5)

Prior to restart following the first refueling outage, the Operating Corporation shall submit for NRC review and approval a reanalysis for the worst large break LOCA using an approved ECCS evaluation model.

Justification for Deletion

Letter KMLNRC 86-176, dated October 1, 1986, transmitted the large break LOCA analysis for WCGS. NRC letter dated April 1, 1987, indicated that the results of the analysis are acceptable and that the license condition has been satisfied. The requirements of this license condition have been met and are, therefore, proposed to be deleted.

2.C.(13) Generic Letter 83-28

The Operating Corporation shall submit responses to and implement the requirements of Generic Letter 83-28 on a schedule which is consistent with that given in their February 29, 1984 and February 6, 1985 letters.

Justification for Deletion

The below table provides a summary of the responses and NRC review of the requirements of Generic Letter 83-28.

<u>Item</u>	<u>WCNOC/NRC Response</u>
Item 1.1 - Post Trip Review - Program Description and Procedure)	NRC letter dated June 26, 1985, indicates that the Post-Trip Review Program and Procedures for WCGS are acceptable.
Item 1.2 - Post Trip Review - Data and Information Capability	NRC letter dated July 14, 1986, indicates that the Post-Trip Review Data and Information Capability for WCGS is acceptable.
Item 2.1.1 - Equipment Classification (Reactor Trip System Components) Item 2.1.2 - Vendor Interface (Reactor Trip System Components)	NRC letter dated September 1, 1988, indicates that the staff has completed its review of licensee submittals dated November 15, 1983 (KMLNRC 83-147), February 29, 1984 (KMLNRC 84-023), and May 29, 1987 (WM 87-0151), and concluded that the programs for equipment classification and vendor interface are acceptable.

<u>Item</u>	<u>WCNOC/NRC Response</u>
Item 2.2.1 - Equipment Classification (Programs for all Safety-Related Components)	NRC letter dated May 31, 1989, indicates that the staff has completed its evaluation of licensee submittals dated March 10, 1983, November 15, 1983 (KMLNRC 83-147), and February 29, 1984 (KMLNRC 84-023), and concluded these responses are acceptable.
Item 2.2.2 - Vendor Interface (Programs for all Safety-Related Components)	Letter KMLNRC 85-051 dated February 6, 1985, indicates that a report describing the vendor interface program would be submitted and implemented prior to December 31, 1986, or prior to startup from the first refueling outage. Letter KMLNRC 86-231 dated December 10, 1986, provided a report describing the programs in place implementing a vendor interface program. Generic Letter 90-03 was issued on March 20, 1990, to clarify the staff position in Part 2 of Item 2.2 of Generic Letter 83-28. Letter WM 90-0161 dated September 25, 1990, provided the response to Generic Letter 90-03. NRC letter dated December 18, 1990, indicated that the staff had reviewed the response and found it acceptable.
Items 3.1.1, 3.1.2, and 3.1.3 - Post Maintenance Testing (Reactor Trip System Components)	Letter KMLNRC 84-023, dated February 29, 1984, provided information regarding the post-maintenance verification of the Reactor Trip System components. NRC letter dated October 7, 1986, indicated that the staff finds that the Reactor Trip System post maintenance testing (Items 3.1.1 and 3.1.2) for Wolf Creek is acceptable. An NRC letter dated October 22, 1986, indicates that the NRC has reviewed letters dated November 15, 1983 (KMLNRC 83-147), and August 12, 1986 (KMLNRC 86-173), and determined that Wolf Creek's response to Item 3.1.3 is acceptable.
Items 3.2.1, 3.2.2, and 3.2.3 - Post Maintenance Testing (all other safety-related components)	Letter KMLNRC 84-023, dated February 29, 1984, provided information regarding the post-maintenance verification of all safety-related components other than the Reactor Trip System. NRC letter dated October 7, 1986, indicated that the staff finds that post maintenance testing (Items 3.2.1 and 3.2.2) for Wolf Creek is acceptable. NRC letter dated October 22, 1986, indicates that the NRC has reviewed letters dated November 15, 1983 (KMLNRC 83-147), and August 12, 1986 (KMLNRC 86-173), and determined that Wolf Creek's response to Item 3.2.3 is acceptable.

<u>Item</u>	<u>WCNOC/NRC Response</u>
Items 4.1, 4.2.1, 4.2.2 - Reactor Trip System Reliability	NRC letter dated July 21, 1986, concluded that the proposed programs described in letters KMLNRC 83-147, dated November 15, 1983, KMLNRC 84-023, dated February 29, 1984, and KMLNRC 85-179, dated July 17, 1985, for these items are acceptable.
Item 4.3 - Reactor Trip System Reliability (Automatic Actuation of Shunt Trip Attachment for Westinghouse Plants)	Letter WM 87-0177, dated June 29, 1987, submitted proposed technical specifications per the guidance in Generic Letter 85-09, "Technical Specifications for Generic Letter 83-28, Item 4.3." Amendment No. 26, dated March 1, 1989, approved the proposed technical specifications.
Item 4.5.1 - Reactor Trip System Reliability (System Functional Testing)	Letter KMLNRC 84-023, dated February 29, 1984, provided information regarding the online functional testing of the Reactor Trip System. NRC letter dated October 7, 1986, indicated that the staff finds that the Reactor Trip System Reliability (System Function Testing) for Wolf Creek is acceptable.
Item 4.5.2 and 4.5.3 - Reactor Trip System Reliability (On-line System Functional Testing)	Letter KMLNRC 83-147, dated November 15, 1983, responded to the staff position regarding Item 4.5.2. NRC letter dated May 31, 1989, indicated that for Item 4.5.2, WCGS is designed to permit on-line functional testing of the Reactor Trip System, including independent testing of the diverse trip features of the reactor trip breakers. For Item 4.5.3, NRC letter dated May 31, 1989, indicates that the staff completed a review of the Westinghouse Owners Group submittal and finds the submittal acceptable.

Based on the above, the requirements of this license condition have been met and are, therefore, proposed to be deleted.

2.C.(14) Surveillance of Hafnium Control Rods (Section 4.2.3.1 (10), SER and SSER #2)

The Operating Corporation shall perform a visual inspection of a sample of hafnium control rods during one of the first five refueling outages. A summary of the results of these inspections shall be submitted to the NRC.

Justification for Deletion

Letter WM 91-0020, dated August 26, 1991, submitted the results of eddy current testing and visual inspections performed during the examination of rod cluster control assemblies during Refueling Outage 3. The requirements of this license condition have been met and are, therefore, proposed to be deleted.

Revision to Technical Specification Table 5.5.9-2

Technical Specification Table 5.5.9-2, "Steam Generator Tube Inspection," requires notification to the NRC pursuant to 10 CFR 50.72(b)(2) if the results of the steam generator tube inspection identify more than 10% of the total tubes inspected are degraded tubes or more than 1% of the inspected tubes are defective (Category C-3). On October 25, 2000, the NRC issued a final rule (Reference 7.3) that amended the event reporting requirements for nuclear power reactors to reduce or eliminate the unnecessary reporting burden associated with events of little or no safety significance. Prior to the final rule, 10 CFR 50.72(b)(2)(i) required a four hour report for any event found while the reactor is shutdown, that , had it been found while the reactor was in operation, would have resulted in the nuclear power plant, including its principle safety barriers, being seriously degraded or being in an unanalyzed condition that significantly compromises plant safety. The final rule revised section (b)(2) of the regulation to only apply to initiation of a plant shutdown required by the Technical Specifications. Under the final rule, 10 CFR 50.72(b)(3)(ii) specifies an eight hour reporting requirement for a principle safety barrier being significantly degraded or the plant being in an unanalyzed condition. NUREG-1022, Revision 2, "Event Reporting Guidelines 10 CFR 50.72 and 50.73," Section 3.2.4 identifies serious steam generator tube degradation as an example of a reportable event or condition under 10 CFR 50.72(b)(3)(ii). The current reporting requirement in Table 5.5.9-2 is incorrect based on the issuance of the final rule. Table 5.5.9-2 is revised to delete the reporting requirement. Deletion of this requirement from the Technical Specifications does not change the requirement to report results that satisfy the criteria of 10 CFR 50.72(b)(3). Additionally, Technical Specification 5.6.10c. still requires reporting the results of steam generator tube inspections, which fall into Category C-3, in a Special Report within 30 days and prior to resumption of plant operation.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

WCNOC has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10 CFR 50.92(c), as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

This request involves administrative changes only. No actual plant equipment or accident analyses will be affected by the proposed changes. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

This request involves administrative changes only. No actual plant equipment or accident analyses will be affected by the proposed change and no failure modes not bounded by previously evaluated accidents will be created. Therefore, the proposed changes do not create a new or different kind of accident from any accident previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel and fuel cladding, Reactor Coolant System pressure boundary, and containment structure) to limit the level of radiation dose to the public. This request involves administrative changes only.

No actual plant equipment or accident analyses will be affected by the proposed change. Additionally, the proposed changes will not relax any criteria used to establish safety limits, will not relax any safety systems settings, or will not relax the bases for any limiting conditions of operation. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Based on the above evaluations, WCNOG concludes that the activities associated with the above described changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92 and accordingly, a finding by the NRC of no significant hazards consideration is justified.

5.2 Regulatory Safety Analysis

Applicable Regulatory Requirements/Criteria

10 CFR 50.72: "Immediate notification requirements for operating nuclear power reactors." This regulatory requirement contains general requirements (section (a)), requirements for reporting non-emergency events (section (b)), and requirements for providing followup notification (section c)).

10 CFR 50.73(a) Reportable events. (1) The holder of an operating license for a nuclear power plant (licensee) shall submit a Licensee Event Report (LER) for any event of the type described in this paragraph within 60 days after the discovery of the event. In the case of an invalid actuation reported under § 50.73(a)(2)(iv), other than actuation of the reactor protection system (RPS) when the reactor is critical, the licensee may, at its option, provide a telephone notification to the NRC Operations Center within 60 days after discovery of the event instead of submitting a written LER. Unless otherwise specified in this section, the licensee shall report an event if it occurred within three years of the date of discovery regardless of the plant mode or power level, and regardless of the significance of the structure, system, or component that initiated the event.

Analysis

Operating License Section 2.C lists conditions regarding Maximum Power Level, Technical Specifications, Antitrust Conditions, Fire Protection, Additional Conditions, and other conditions that are proposed for deletion. Operating License Section 2.F requires that Wolf Creek Nuclear Operating Corporation (WCNOC) notify the NRC Operations Center via the Emergency Notification System of violations of the requirements in Section 2.C within 24 hours and with written followup within thirty days in accordance with the procedures described in 10 CFR 50.73. The requirements of Section 2.F of the license are adequately addressed by the reporting requirements identified in 10 CFR 50.72 and 10 CFR 50.73.

Deviations from the conditions regarding Maximum Power Level, Technical Specifications, Fire Protection, and Additional Conditions are adequately governed by the requirements of 10 CFR 50.72 and 10 CFR 50.73.

The condition regarding Antitrust is an administrative issue and has no safety significance. Consequently, it is not relevant to the proposed elimination of the reporting and notification requirements in Section 2.F.

The proposed changes will reduce unnecessary regulatory burden and will allow WCNOC to take advantage of the revision to 10 CFR 50.73 that allows for Licensee Event Reports to be submitted within 60 days instead of 30 days as required by the current Section 2.F.

License Conditions 2.C.(4), 2.C.(6), 2.C.(7), 2.C.(8), 2.C.(9), 2.C.(10), 2.C.(11), 2.C.(12), 2.C.(13), and 2.C.(14) are conditions that have been completed and are considered obsolete. The proposed changes either delete or modify existing license conditions which have been completed or are otherwise no longer in effect.

The current reporting requirement in Technical Specification Table 5.5.9-2 is incorrect based on the issuance of the final rule (Reference 7.3). Table 5.5.9-2 is revised to delete the reporting requirement. Deletion of this requirement from the Technical Specifications does not change the requirement to report results that satisfy the criteria of 10 CFR 50.72(b)(3).

Conclusion

The proposed changes either delete or modify existing license conditions which have been completed or are otherwise no longer in effect. The deletion of Section 2.F of the Operating License and the changes to Technical Specification Table 5.5.9-2 are consistent with the changes recently implemented in 10 CFR 50.72 and 10 CFR 50.73.

6.0 ENVIRONMENTAL EVALUATION

WCNOC has determined that the proposed amendment is a change to reporting and administrative requirements as described in 10 CFR 51.22(c)(10). Accordingly, the proposed amendment meets eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.

7.0 REFERENCES

- 7.1 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors."
- 7.2 10 CFR 50.73, "Licensee event report system."
- 7.3 Federal Register, Vol. 65, No. 207, pg. 63769, "Reporting Requirements for Nuclear Power Reactors and Independent Spent Fuel Storage Installations at Power Reactor Sites."

8.0 PRECEDENTS

There is precedent for allowing deletion of Section 2.F and the specified conditions in Section 2.C from the Facility Operating License. The Duquesne Light Company operating licenses for Beaver Valley Power Station, Units 1 and 2 (Facility Operating License Numbers DPR-66 and NPF-73) have been amended to delete the Condition on reporting of violation of license conditions and other specified conditions via Amendments 220 and 97 respectively.

ATTACHMENT III
MARKUP OF OPERATING LICENSE

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 135, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. The Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Antitrust Conditions

Kansas Gas & Electric Company and Kansas City Power & Light Company shall comply with the antitrust conditions delineated in Appendix C to this license.

(4) Environmental Qualification (Section 3.11, SSER #4, Section 3.11, SSER #5)*

~~All electrical equipment within the scope of 10 CFR 50.49 shall be qualified by November 30, 1985.~~

Deleted per
Amendment No. XXX

(5) Fire Protection (Section 9.5.1, SER, Section 9.5.1.8, SSER #5)

- (a) The Operating Corporation shall maintain in effect all provisions of the approved fire protection program as described in the SNUPPS Final Safety Analysis Report for the facility through Revision 17, the Wolf Creek site addendum through Revision 15, and as approved in the SER through Supplement 5, subject to provisions b & c below.
- (b) The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
- (c) Deleted per Amdt #15, dated 2-24-88.

*The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

(6) Qualification of Personnel (Section 13.1.2, SSER #5, Section 18, SSER #1)

~~The Operating Corporation shall have on each shift operators who meet the requirements described in Attachment 2.~~

(7) NUREG-0737 Supplement 1 Conditions (Section 22, SER)

~~The Operating Corporation shall complete the requirements described in Attachment 3 to the satisfaction of the NRC. These conditions reference the appropriate items in Section 22, "TMI Action Plan Requirements for Applicants for Operating Licenses," in the Safety Evaluation Report and Supplements 1, 2, 3, 4, and 5 of NUREG-0881.~~

(8) Post-Fuel-Loading Initial Test Program (Section 14, SER Section 14, SSER #5)

~~Any changes in the Initial Test Program described in Section 14 of the FSAR made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.~~

(9) Inservice Inspection Program (Sections 5.2.4 and 6.6, SER)

~~By December 11, 1985, KG&E shall submit for staff review and approval, the inservice inspection program which conforms to the ASME Code in effect on March 11, 1984.~~

(10) Emergency Planning

~~In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule, 44 CFR Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of emergency preparedness, the provisions of 10 CFR Section 50.54(s)(2) will apply.~~

Deleted per
Amendment No. XXX

(11) Steam Generator Tube Rupture (Section 15.4.4, SSER #5)

~~Prior to restart following the first refueling outage, the Operating Corporation shall submit for NRC review and approval an analysis which demonstrates that the steam generator single-tube rupture (SGTR) analysis presented in the FSAR is the most severe case with respect to the release of fission products and calculated doses. Consistent with the analytical assumptions, the licensee shall propose all necessary changes to Appendix A to this license.~~

(12) LOCA Reanalysis (Section 15.3.7, SSER #5)

~~Prior to restart following the first refueling outage, the Operating Corporation shall submit for NRC review and approval a reanalysis for the worst large break LOCA using an approved ECCS evaluation model.~~

(13) Generic Letter 83-28

~~The Operating Corporation shall submit responses to and implement the requirements of Generic Letter 83-28 on a schedule which is consistent with that given in their February 29, 1984 and February 6, 1985 letters.~~

(14) Surveillance of Hafnium Control Rods (Section 4.2.3.1 (10), SER and SSER #2)

~~The Operating Corporation shall perform a visual inspection of a sample of hafnium control rods during one of the first five refueling outages. A summary of the results of these inspections shall be submitted to the NRC.~~

(15) Additional Conditions

The Additional Conditions contained in Appendix D, as revised through Amendment No. 123, are hereby incorporated into this license. Wolf Creek Nuclear Operating Corporation shall operate the facility in accordance with the Additional Conditions.

- D. Exemptions from certain requirements of Appendix J to 10 CFR Part 50, and from a portion of the requirements of General Design Criterion 4 of Appendix A to 10 CFR Part 50, are described in the Safety Evaluation Report. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted pursuant to 10 CFR 50.12. With the granting of these exemptions the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

Deleted per
Amendment No. XXX

E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Wolf Creek Generating Station Physical Security Plan," with revisions submitted through August 2, 1988; "Wolf Creek Generating Station Security Training Qualification Plan," with revisions submitted through August 2, 1988; and "Wolf Creek Generating Station Safeguards Contingency Plan," with revisions submitted through August 2, 1988. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

Deleted per
Amendment No. XXX

~~F. Except as otherwise provided in the Technical Specifications or Environmental Protection Plan, the licensee shall report any violations of the requirements contained in Section 2.C of this license in the following manner: Initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System with written followup within thirty days in accordance with the procedures described in 10 CFR 50.73(b), (c) and (e).~~

G. The licensees shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

H. This license is effective as of the date of issuance and shall expire at Midnight on March 11, 2025.

For the Nuclear Regulatory Commission

"Original Signed By"

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Attachments/Appendices:

1. Attachment 1 - Deleted
2. Attachment 2 - ~~Operating Staff Experience Requirements~~
3. Attachment 3 - ~~NUREG-0737, Supplement 1, Requirements~~
4. Appendix A - Technical Specifications (NUREG-1136)
5. Appendix B - Environmental Protection Plan
6. Appendix C - Antitrust Conditions
7. Appendix D - Additional Conditions

Deleted

ATTACHMENT 2

Operating Staff Experience Requirements

The Operating Corporation shall have a licensed senior operator on each shift who has had at least six months of hot operating experience on a same type plant, including at least six weeks at power levels greater than 20% of full power, and who has had startup and shutdown experience. For those shifts where such an individual is not available on the plant staff, an advisor shall be provided who has had at least four years of power plant experience, including two years of nuclear plant experience, and who has at least one year of experience on shift as a licensed senior operator at a similar type facility. Use of advisors who were licensed only at the RO level will be evaluated on a case-by-case basis. Advisors shall be trained on plant procedures, technical specifications and plant systems, and shall be examined on these topics at a level sufficient to assure familiarity with the plant. For each shift, the remainder of the shift crew shall be trained in the role of the advisors. These advisors, or fully trained and qualified replacements, shall be retained until the experience levels identified in the first sentence above have been achieved. The names of any replacement advisors shall be certified by the Operating Corporation prior to these individuals being placed on shift. The NRC shall be notified at least 30 days prior to the date the Operating Corporation proposes to release the advisors from further service.

ATTACHMENT 3

NUREG-0737, SUPPLEMENT 1, REQUIREMENTS

(1) Functional and Task Analysis (I.C.1, SSER #5)

Prior to startup following the first refueling outage, the Operating Corporation shall submit for staff review and approval, a description of the process used to complete the functional and task analysis, including a description and justification for all information and control deviations from the Westinghouse Owners Group Emergency Response Guidelines, Revision 1.

(2) Emergency Response Capabilities (Generic Letter 82-33, Supplement 1 to NUREG-0737)

Prior to restart following the first refueling outage, the Operating Corporation shall have a fully functional Technical Support Center and Emergency Operations Facility and a fully operable Emergency Response Facility and a fully operable Emergency Response Facilities Information System (ERFIS).

(3) Regulatory Guide 1.97 (Section 7.5.2.3, SSER #3)

Prior to restart following the first refueling outage, the Operating Corporation shall have installed and operable the following instrumentation.

- (a) Source range instrumentation qualified to post-accident conditions
- (b) Reactor vessel water level instrumentation
- (c) Subcooling monitors
- (d) Radiation monitors for releases from steam generator safety/relief valves or atmospheric dump valves, and
- (e) Auxiliary feedwater pump turbine exhaust monitor

ATTACHMENT IV
MARKUP OF TECHNICAL SPECIFICATION PAGE

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Tube Surveillance Program (continued)

TABLE 5.5.9-2

STEAM GENERATOR TUBE INSPECTION

1ST SAMPLE INSPECTION			2ND SAMPLE INSPECTION		3RD SAMPLE INSPECTION	
Sample Size	Result	Action Required	Result	Action Required	Result	Action Required
A minimum of S Tubes per S.G.	C-1	None	N.A.	N.A.	N.A.	N.A.
	C-2	Plug defective tubes and inspect additional 2S tubes in this S.G.	C-1	None	N.A.	N.A.
			C-2	Plug defective tubes and inspect additional 4S tubes in this S.G.	C-1	None
					C-2	Plug defective tubes
					C-3	Perform action for C-3 result of first sample
	C-3	Perform action for C-3 result of first sample	N.A.	N.A.		
	C-3	Inspect all tubes in this S.G., plug defective tubes and inspect 2S tubes in each other S.G. <i>Notification to NRC pursuant to §50.72(b)(2) of 10 CFR Part 50</i>	All other S.G.s are C-1	None	N.A.	N.A.
			Some S.G.s C-2 but no additional S.G. are C-3	Perform action for C-2 result of second sample	N.A.	N.A.
			Additional S.G. is C-3	Inspect all tubes in each S.G. and plug defective tubes. <i>Notification to NRC pursuant to §50.72(b)(2) of 10 CFR Part 50</i>	N.A.	N.A.

$S = 3 \cdot \frac{N}{n} \%$

Where N is the number of steam generators in the unit, and n is the number of steam generators inspected during an inspection.

(continued)

ATTACHMENT V
RETYPE TECHNICAL SPECIFICATION PAGE

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Tube Surveillance Program (continued)

TABLE 5.5.9-2

STEAM GENERATOR TUBE INSPECTION

1ST SAMPLE INSPECTION			2ND SAMPLE INSPECTION		3RD SAMPLE INSPECTION	
Sample Size	Result	Action Required	Result	Action Required	Result	Action Required
A minimum of S Tubes per S.G.	C-1	None	N.A.	N.A.	N.A.	N.A.
	C-2	Plug defective tubes and inspect additional 2S tubes in this S.G.	C-1	None	N.A.	N.A.
			C-2	Plug defective tubes and inspect additional 4S tubes in this S.G.	C-1	None
					C-2	Plug defective tubes
			C-3	Perform action for C-3 result of first sample	N.A.	N.A.
	C-3	Inspect all tubes in this S.G., plug defective tubes and inspect 2S tubes in each other S.G.	All other S.G.s are C-1	None	N.A.	N.A.
			Some S.G.s C-2 but no additional S.G. are C-3	Perform action for C-2 result of second sample	N.A.	N.A.
			Additional S.G. is C-3	Inspect all tubes in each S.G. and plug defective tubes.	N.A.	N.A.

$$S = 3 \cdot \frac{N}{n} \%$$

Where N is the number of steam generators in the unit, and n is the number of steam generators inspected during an inspection.

(continued)

5.5 Programs and Manuals (continued)

5.5.10 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. The program shall include:

- a. Identification of a sampling schedule for the critical variables and control points for these variables;
- b. Identification of the procedures used to measure the values of the critical variables;
- c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage;
- d. Procedures for the recording and management of data;
- e. Procedures defining corrective actions for all off control point chemistry conditions; and
- f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.11 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, and in accordance with the guidance specified below.

- a. Demonstrate for each of the ESF systems that an in-place test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 1% when tested in accordance with Regulatory Guide 1.52, Revision 2 at the system flowrate specified below $\pm 10\%$.

ESF Ventilation System	Flowrate
Control Room Emergency Ventilation System-Filtration	2000 cfm
Control Room Emergency Ventilation System-Pressurization	750 cfm
Auxiliary/Fuel Building Emergency Exhaust	6500 cfm

(continued)

LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Tony Harris, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4038.

COMMITMENT	Due Date/Event
The amendment will be implemented within 30 days of issuance of the license amendment.	Within 30 days of issuance of the license amendment