



Richard A. Muench
Vice President Technical Services

OCT 22 2001

ET 01-0030

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

Reference: Letter ET 01-0008 dated April 3, 2001, from R. A. Muench, WCNOC, to
USNRC

Subject: Docket No. 50-482: Supplemental Information for the Relocation of
Technical Specification Cycle Specific Parameters to the Core Operating
Limits Report

Gentlemen:

The Reference proposed changes to relocated Reactor Coolant System (RCS) related cycle-specific parameter limits from the Technical Specifications to the CORE OPERATING LIMITS REPORT (COLR). The justification to implement the expansion of the COLR is provided in Westinghouse WCAP-14483-A, "Generic Methodology for Expanding Core Operating Limits Report." The changes proposed in the Reference are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-339, Rev. 2.

In a telephone conference on September 14, 2001 with Mr. Jack Donohew, NRC Project Manager for the Wolf Creek Generating Station (WCGS), additional questions were initiated concerning the proposed change. Attachment I provides supplemental information in response to the questions. Additionally, Wolf Creek Nuclear Operating Corporation (WCNOC) determined that an additional change to Technical Specification 5.6.5 is necessary. Attachment II provides the additional change to Technical Specification 5.6.5.

The WCNOC Plant Safety Review Committee and the Nuclear Safety Review Committee have reviewed the additional change to Technical Specification 5.6.5.

ADD1
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The supplemental information and additional change to the Technical Specifications do not impact the conclusions of the No Significant Hazards Consideration Determination provided in the Reference.

A copy of this correspondence, with attachments, is being provided to the designated Kansas State Official. There are no regulatory commitments contained in this submittal. 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,

A handwritten signature in black ink, appearing to read 'R. Muench', written in a cursive style.

Richard A. Muench

RAM/rlr
Attachments

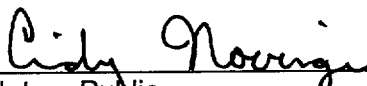
cc: V. L. Cooper (KDHE), w/a
J. N. Donohew (NRC), w/a
W. D. Johnson (NRC), w/a
E. W. Merschoff (NRC), w/a
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

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

SUBSCRIBED and sworn to before me this 22nd day of Oct., 2001.


Notary Public



Expiration Date July 8, 2002

ATTACHMENT I
SUPPLEMENTAL INFORMATION

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Question:

1. What NRC methodology is utilized for determining the limits for pressurizer pressure and Reactor Coolant System (RCS) average temperature in Technical Specification (TS) 3.4.1?

Response:

The analytical methods that address TS 3.4.1 are WCNOG Topical Report TR 00-0025 W01, "Core Thermal Hydraulic Analysis Methodology for the Wolf Creek Generating Station," and WCNOG Topical Report NSAG-006, "Reload Safety Evaluation Methodology for the Wolf Creek Generating Station."

Question:

2. Should TS 2.1.1 be referenced in TS 5.6.5a?

Response:

TS Figure 2.1.1-1, "Reactor Core Limits," is being relocated to the CORE OPERATING LIMITS REPORT (COLR), and is being replaced with more specific fuel departure from nucleate boiling ratio (DNBR) and peak fuel centerline temperature safety limits. A review of WCAP-14483-A, "Generic Methodology for Expanding Core Operating Limits Report," and the improved Standard Technical Specification determined that those Technical Specifications that refer to a specific core operating limit as being specified in the COLR should be referenced in TS 5.6.5a. Attachment II includes the additional changes to TS 5.6.5a. The revised TS page replaces page 9 of 11 in Attachment III to letter ET 01-0008, dated April 3, 2001 (original amendment request).

Question:

3. TS 5.6.5 is revised to allow topical reports to be identified by title and number only consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-363, Revision 0. Traveler TSTF-363 included a letter from the NRC to Siemens Power Corporation, states in part: "... only NRC approved methodology may be used and since the COLR is a FSAR-related document, changes to the COLR require prior licensee review for unreviewed safety questions under 10 CFR 50.59." Should the COLR be referenced in Chapter 16 of the Updated Safety Analysis Report (USAR) and considered to be incorporated by reference into the USAR?

Response:

The Administrative Controls section in the TS provide requirements and describe change processes for several programs and manuals (e.g., Offsite Dose Calculation Manual and the CORE OPERATING LIMITS REPORT (COLR)). 10 CFR 50.59 does not apply to a program or manual when the change process for that program or manual is described in the TS. Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications," provided for removal of cycle specific parameter limits from the TS. These limits are developed using a NRC approved methodology during the reload design. 10 CFR 50.59 applies to the reload design activity; an activity that will probably result in the need to perform a 50.59

evaluation. The 50.59 evaluation for this activity should address and discuss all the changes required to the cycle specific parameter limits. The reload design evaluation should demonstrate that the limits were developed using an approved methodology and that the analysis shows that safety limits provided in the TS remain applicable (or must be revised in accordance with 10 CFR 50.92). Preparation of the COLR is part of the reload design activity. As such, it is not necessary that the COLR be referenced in the USAR.

ATTACHMENT II
ADDITIONAL TECHNICAL SPECIFICATION CHANGES

5.6 Reporting Requirements (continued)

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. Specification 3.1.3: Moderator Temperature Coefficient (MTC),
2. Specification 3.1.5: Shutdown Bank Insertion Limits,
3. Specification 3.1.6: Control Bank Insertion Limits,
4. Specification 3.2.3: Axial Flux Difference,
5. Specification 3.2.1: Heat Flux Hot Channel Factor, $F_Q(Z)$,
6. Specification 3.2.2: Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}^N$),
7. Specification 3.9.1: Boron Concentration, ~~and~~
8. SHUTDOWN MARGIN for Specification 3.1.1 and 3.1.4, 3.1.5, 3.1.6, and 3.1.8 ^⑤

9. Specification 3.3.1: Overtemperature ΔT and Overpower ΔT Trip Setpoints,

(continued)

10. Specification 3.4.1: Reactor Coolant System pressure, temperature, and flow DNB limits, and

11. Specification 2.1.1: Reactor Core Safety Limits.