

October 3, 1990

Docket No. 50-482

Mr. Bart D. Withers  
President and Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
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Burlington, Kansas 66839

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Dear Mr. Withers:

SUBJECT: WOLF CREEK GENERATING STATION - AMENDMENT NO. 41 TO FACILITY  
OPERATING LICENSE NO. NPF-42 (TAC NO. 77140)

The Commission has issued the enclosed Amendment No. 41 to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station. The amendment consists of changes to the Technical Specifications in response to your application dated July 2, 1990 (ET 90-0104).

The amendment revises Technical Specification 4.0.2 and its associated Bases to modify the existing surveillance interval extension provisions as provided by Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals."

A copy of our related Safety Evaluation is enclosed. The notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

(ORIGINAL SIGNED BY)

Douglas V. Pickett, Project Manager  
Project Directorate IV-2  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 41 to NPF-42
2. Safety Evaluation

cc w/enclosures:  
See next page

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October 3, 1990

Mr. Bart D. Withers

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 41  
License No. NPF-42

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Wolf Creek Generating Station (the facility) Facility Operating License No. NPF-42 filed by the Wolf Creek Nuclear Operating Corporation (the Corporation), dated July 2, 1990, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

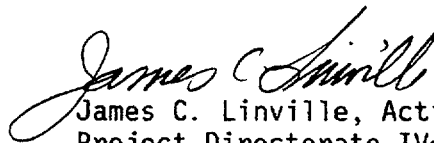
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-42 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 41, 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. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



James C. Linville, Acting Director  
Project Directorate IV-2  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 3, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 41

FACILITY OPERATING LICENSE NO. NPF-42

DOCKET NO. 50-482

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE

3/4 0-2  
B 3/4 0-2  
B 3/4 0-3

INSERT

3/4 0-2  
B 3/4 0-2  
B 3/4 0-3

## 3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

### 3/4.0 APPLICABILITY

#### LIMITING CONDITION FOR OPERATION

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3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in:

- a. At least HOT STANDBY within the next 6 hours,
- b. At least HOT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications.

This Specification is not applicable in MODE 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

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4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified interval.

4.0.3 Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

## 3/4.0 APPLICABILITY

### BASES

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The specifications of this section provide the general requirements applicable to each of the Limiting Conditions for Operation and Surveillance Requirements within Section 3/4. In the event of a disagreement between the requirements stated in these Technical Specifications and that stated in an applicable Federal Regulation or Act, the requirements stated in the applicable Federal Regulation or Act, shall take precedence and shall be met.

3.0.1 This specification defines the applicability of each specification in terms of defined OPERATIONAL MODES or other specified conditions and is provided to delineate specifically when each specification is applicable.

3.0.2 This specification defines those conditions necessary to constitute compliance with the terms of an individual Limiting Condition for Operation and associated ACTION requirement.

3.0.3 The specification delineates the measures to be taken for those circumstances not directly provided for in the ACTION statements and whose occurrence would violate the intent of a specification. For example, Specification 3.5.2 requires two independent ECCS subsystems to be OPERABLE and provides explicit ACTION requirements if one ECCS subsystem is inoperable. Under the requirements of Specification 3.0.3, if both the required ECCS subsystems are inoperable, within 1 hour measures must be initiated to place the unit in at least HOT STANDBY within the next 6 hours, and in at least HOT SHUTDOWN within the following 6 hours. As a further example, Specification 3.6.2.1 requires two Containment Spray Systems to be OPERABLE and provides explicit ACTION requirements if one Containment Spray System is inoperable. Under the requirements of Specification 3.0.3 if both the required Containment Spray Systems are inoperable, within 1 hour measures must be initiated to place the unit in at least HOT STANDBY within the next 6 hours, in at least HOT SHUTDOWN within the following 6 hours, and in COLD SHUTDOWN within the subsequent 24 hours. It is acceptable to initiate and complete a reduction in OPERATIONAL MODES in a shorter time interval than required in the ACTION statement and to add the unused portion of this allowable out-of-service time to that period for operation in subsequent lower OPERATIONAL MODE(S). Stated allowable out-of-service times are applicable regardless of the OPERATIONAL MODE(S) in which the inoperability is discovered but the times provided for achieving a mode reduction are not applicable if the inoperability is discovered in a mode lower than the applicable mode. For example, if the Containment Spray System was discovered to be inoperable while in STARTUP, the ACTION Statement would allow up to 156 hours to achieve COLD SHUTDOWN. If HOT STANDBY is attained in 16 hours rather than the allowed 78 hours, 140 hours would still be available before the plant would be required to be in COLD SHUTDOWN. However, if this system was discovered to be inoperable while in HOT STANDBY, the 6 hours provided to achieve HOT STANDBY would not be additive to the time available to achieve COLD SHUTDOWN so that the total allowable time is reduced from 156 hours to 150 hours.

3.0.4 This specification provides that entry into an OPERATIONAL MODE or other specified applicability condition must be made with: (1) the full complement of required systems, equipment, or components OPERABLE, and (2) all other parameters as specified in the Limiting Conditions for Operation being met without regard for allowable deviations and out-of-service provisions contained in the ACTION statements.



## APPLICABILITY

### BASES

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The intent of this provision is to ensure that facility operation is not initiated with either required equipment or systems inoperable or other specified limits being exceeded.

Exceptions to this provision have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. These exceptions are stated in the ACTION statements of the appropriate specifications.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

4.0.2 Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

4.0.3 The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under these criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements. Items may be determined inoperable

## APPLICABILITY

### BASES

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during use, during surveillance tests or in accordance with this specification. Therefore, ACTION statements are entered when the Surveillance Requirements should have been performed rather than at the time it is discovered that the tests were not performed.

4.0.4 This specification ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an OPERATIONAL MODE or other applicable condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.

4.0.5 This specification ensures that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these Technical Specifications.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. For example, the requirements of Specification 4.0.4 to perform surveillance activities prior to entry into an OPERATIONAL MODE or other specified applicability condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps to be tested up to 1 week after return to normal operation. And for example, the Technical Specification definition of OPERABLE does not grant a grace period before a device that is not capable of performing its specified function is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 41 TO FACILITY OPERATING LICENSE NO. NPF-42

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

INTRODUCTION

By application dated July 2, 1990, Wolf Creek Nuclear Operating Corporation (the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-42) for the Wolf Creek Generating Station. The proposed change removes the provision of Specification 4.0.2 that limits the combined time interval for three consecutive surveillances to less than 3.25 times the specified interval. Guidance on this proposed change to the Technical Specifications (TS) was provided to all power reactor licensees and applicants by Generic Letter 89-14, dated August 21, 1989.

EVALUATION

TS 4.0.2 includes the provision that allows a surveillance interval to be extended by 25 percent of the specified time interval. This extension provides flexibility for scheduling the performance of surveillances and to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. TS 4.0.2 further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. The purpose of this provision is to assure that surveillances are not extended repeatedly as an operational convenience to provide an overall increase in the surveillance interval.

Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25 percent allowance for extending surveillances that are performed on a refueling outage basis.

Extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the surveillance. This may occur when transient plant operating conditions exist or when safety systems are out of service for maintenance or other surveillance activities. In such cases, the benefit to safety of extending a surveillance interval would exceed any safety benefit derived by limiting the use of the 25 percent allowance to extend a surveillance. Furthermore, there is the administrative burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit.

In view of these findings, the staff concluded that TS 4.0.2 should be changed to remove the 3.25 limit for all surveillances because its removal will have an overall positive effect on safety. The guidance provided in Generic Letter 89-14 included the following change to this specification and removes the 3.25 limit on three consecutive surveillances with the following statement:

"4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval."

In addition, the Bases of this specification were updated to reflect this change and noted that it is not the intent of the allowance for extending surveillance intervals that it be used repeatedly merely as an operational convenience to extend surveillance intervals beyond that specified.

The licensee has proposed changes to Specification 4.0.2 that are consistent with the guidance provided in Generic Letter 89-14, as noted above. On the basis of its review of this matter, the staff finds that the above change to the TS for the Wolf Creek Generating Station Unit 1 are acceptable.

#### ENVIRONMENTAL CONSIDERATION

The amendment involves a change in a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposures. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: October 3, 1990

Principal Contributors: Thomas G. Dunning, OTSB/DOEA  
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