

December 12, 1995

Mr. Neil S. Carns
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, Kansas 66839

SUBJECT: WOLF CREEK GENERATING STATION - AMENDMENT NO. 93 TO FACILITY
OPERATING LICENSE NO. NPF-42 (TAC NO. M93347)

Dear Mr. Carns:

The Commission has issued the enclosed Amendment No. 93 to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated August 22, 1995.

The amendment revises the requirements of TS 3.3.1 and TS 3.3.2 and relocates Tables 3.3-2 and 3.3-5 and applicable Bases discussions, which provide the response time limits for the reactor trip system (RTS) and the engineered safety features actuation system (ESFAS) instruments, from the TS to the Updated Safety Analysis Report (USAR). The licensee has stated that the next USAR change request will include these changes.

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

James C. Stone, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosures: 1. Amendment No. 93 to NPF-42
2. Safety Evaluation

cc w/encls: See next page

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JRoe JDyer, RIV
EABrown ACRS
JStone EPeyton
LHurley, RIV CMH2 (SE)
WReckley JWermiel

DOCUMENT NAME: WC93347.AMD

OFC	LA:PDIV-2	PDIV-2	PDIV-2	DRCH/HICB	OGC
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OFC	LA:PDIV-2	PDIV-2	PDIV-2	DRCH/HICB	OGC
NAME	EPeyton	EBrown	JStone	JWermiel	R. B. Schmitt
DATE	11/15/95	11/15/95	11/15/95	11/16/95	11/16/95

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Handwritten: J. N. 12/8/95



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 12, 1995

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President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
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Sincerely,

A handwritten signature in cursive script that reads "James C. Stone".

James C. Stone, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-482

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2. Safety Evaluation

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Mr. Neil S. Carns

- 2 -

December 12, 1995

cc w/encls:

Jay Silberg, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW
Washington, D.C. 20037

Vice President Plant Operations
Wolf Creek Nuclear Operating Corporation
P. O. Box 411
Burlington, Kansas 66839

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 311
Burlington, Kansas 66839

Supervisor Licensing
Wolf Creek Nuclear Operating Corporation
P. O. Box 411
Burlington, Kansas 66839

Chief Engineer
Utilities Division
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
8201 NRC Road
Steedman, Missouri 65077-1302

Office of the Governor
State of Kansas
Topeka, Kansas 66612

Supervisor Regulatory Compliance
Wolf Creek Nuclear Operating Corporation
P. O. Box 411
Burlington, Kansas 66839

Attorney General
Judicial Center
301 S.W. 10th
2nd Floor
Topeka, Kansas 66612

County Clerk
Coffey County Courthouse
Burlington, Kansas 66839

Public Health Physicist
Bureau of Air & Radiation
Division of Environment
Kansas Department of Health
and Environment
Forbes Field Building 283
Topeka, Kansas 66620



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 93
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 August 22, 1995, 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.

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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. 93, 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 to be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



James C. Stone, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: December 12, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 93

FACILITY OPERATING LICENSE NO. NPF-42

DOCKET NO. 50-482

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

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3/4 3-8
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3/4 3-29
3/4 3-30
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3/4 3-32
3/4 3-33
B 3/4 3-1
B 3/4 3-2

INSERT

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B 3/4 3-2

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LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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3/4.3 INSTRUMENTATION

3/4.3.1 REACTOR TRIP SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.1 As a minimum, the Reactor Trip System instrumentation channels and interlocks of Table 3.3-1 shall be OPERABLE.

APPLICABILITY: As shown in Table 3.3-1.

ACTION:

As shown in Table 3.3-1.

SURVEILLANCE REQUIREMENTS

4.3.1.1 Each Reactor Trip System instrumentation channel and interlock and the automatic trip logic shall be demonstrated OPERABLE by the performance of the Reactor Trip System Instrumentation Surveillance Requirements specified in Table 4.3-1.

4.3.1.2 The REACTOR TRIP SYSTEM RESPONSE TIME of each Reactor trip function shall be demonstrated to be within its limit at least once per 18 months. Neutron detectors are exempt from response time testing. Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific Reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1.

TABLE 3.3-1

REACTOR TRIP SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
1. Manual Reactor Trip	2	1	2	1, 2	1
	2	1	2	3*, 4*, 5*	10
2. Power Range, Neutron Flux					
a. High Setpoint	4	2	3	1, 2	2#
b. Low Setpoint	4	2	3	1###, 2	2#
3. Power Range, Neutron Flux High Positive Rate	4	2	3	1, 2	2#
4. Power Range, Neutron Flux, High Negative Rate	4	2	3	1, 2	2#
5. Intermediate Range, Neutron Flux	2	1	2	1###, 2	3
6. Source Range, Neutron Flux					
a. Startup	2	1	2	2###**	4
b. Shutdown	2	1	2	3**, 4, 5	5
7. Overtemperature ΔT Four Loop Operation	4	2	3	1, 2	6#
8. Overpower ΔT Four Loop Operation	4	2	3	1, 2	6#
9. Pressurizer Pressure-Low	4	2	3	1	6#
10. Pressurizer Pressure-High	4	2	3	1, 2	6#

WOLF CREEK - UNIT 1

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INSTRUMENTATION

3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.2 The Engineered Safety Features Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4.

APPLICABILITY: As shown in Table 3.3-3.

ACTION:

- a. With an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 3.3-4 adjust the Setpoint consistent with the Trip Setpoint value.
- b. With an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-4, either:
 1. Adjust the Setpoint consistent with the Trip Setpoint value of Table 3.3-4 and determine within 12 hours that Equation 2.2-1 was satisfied for the affected channel, or
 2. Declare the channel inoperable and apply the applicable ACTION statement requirements of Table 3.3-3 until the channel is restored to OPERABLE status with its Setpoint adjusted consistent with the Trip Setpoint value.

$$\text{Equation 2.2-1} \quad Z + R + S \leq TA$$

Where:

Z = The value from Column Z of Table 3.3-4 for the affected channel,

R = The "as measured" value (in percent span) of rack error for the affected channel,

S = Either the "as measured" value (in percent span) of the sensor error, or the value from Column S (Sensor Error) of Table 3.3-4 for the affected channel, and

TA = The value from Column TA (Total Allowance) of Table 3.3-4 for the affected channel.

- c. With an ESFAS instrumentation channel or interlock inoperable, take the ACTION shown in Table 3.3-3.

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3/4.3 INSTRUMENTATION

BASES

3/4.3.1 and 3/4.3.2 REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

The OPERABILITY of the Reactor Trip System and the Engineered Safety Features Actuation System instrumentation and interlocks ensure that: (1) the associated ACTION and/or Reactor trip will be initiated when the parameter monitored by each channel or combination thereof reaches its Setpoint, (2) the specified coincidence logic is maintained, (3) sufficient redundancy is maintained to permit a channel to be out-of-service for testing or maintenance, and (4) sufficient system functional capability is available from diverse parameters.

The OPERABILITY of these systems is required to provide the overall reliability, redundancy, and diversity assumed available in the facility design for the protection and mitigation of accident and transient conditions. The integrated operation of each of these systems is consistent with the assumptions used in the safety analyses. The Surveillance Requirements specified for these systems ensure that the overall system functional capability is maintained comparable to the original design standards. The periodic surveillance tests performed at the minimum frequencies are sufficient to demonstrate this capability.

When determining compliance with action statement requirements, addition to the RCS of borated water with a concentration greater than or equal to the minimum required RWST concentration shall not be considered to be a positive reactivity change.

The Engineered Safety Features Actuation System Instrumentation Trip Setpoints specified in Table 3.3-4 are the nominal values at which the bistables are set for each functional unit. A Setpoint is considered to be adjusted consistent with the nominal value when the "as measured" Setpoint is within the band allowed for calibration accuracy. Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with WCAP-10271, and Supplement 1, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System," supplements to that report, and the NRC's Safety Evaluation dated February 21, 1985, WCAP-10271 Supplement 2 and WCAP-10271-P-A Supplement 2, Revision 1, "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation System," the NRC's Safety Evaluation dated February 22, 1989, and the NRC's Supplemental Safety Evaluation dated April 30, 1990. Surveillance intervals and out of service times were determined based on maintaining an appropriate level of reliability of the Reactor Protection System and Engineered Safety Features instrumentation.

INSTRUMENTATION

BASES

REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION (Continued)

To accommodate the instrument drift assumed to occur between operational tests and the accuracy to which Setpoints can be measured and calibrated, Allowable Values for the Setpoints have been specified in Table 3.3-4. Operation with Setpoints less conservative than the Trip Setpoint but within the Allowable Value is acceptable since an allowance has been made in the safety analysis to accommodate this error. An optional provision has been included for determining the OPERABILITY of a channel when its Trip Setpoint is found to exceed the Allowable Value. The methodology of this option utilizes the "as measured" deviation from the specified calibration point for rack and sensor components in conjunction with a statistical combination of the other uncertainties of the instrumentation to measure the process variable and the uncertainties in calibrating the instrumentation. In Equation 3.3-1, $Z + R + S \leq TA$, the interactive effects of the errors in the rack and the sensor, and the "as measured" values of the errors are considered. Z, as specified in Table 3.3-4, in percent span, is the statistical summation of errors assumed in the analysis excluding those associated with the sensor and rack drift and the accuracy of their measurement. TA or Total Allowance is the difference, in percent span, between the Trip Setpoint and the value used in the analysis for the actuation. R or Rack Error is the "as measured" deviation, in percent span, for the affected channel from the specified Trip Setpoint. S or Sensor Error is either the "as measured" deviation of the sensor from its calibration point or the value specified in Table 3.3-4, in percent span, from the analysis assumptions.

The methodology to derive the Trip Setpoints is based upon combining all of the uncertainties in the channels. Inherent to the determination of the Trip Setpoints are the magnitudes of these channel uncertainties. Sensor and rack instrumentation utilized in these channels are expected to be capable of operating within the allowances of these uncertainty magnitudes. Rack drift in excess of the Allowable Value exhibits the behavior that the rack has not met its allowance. Being that there is a small statistical chance that this will happen, an infrequent excessive drift is expected. Rack or sensor drift, in excess of the allowance that is more than occasional, may be indicative of more serious problems and should warrant further investigation.

The measurement of response time at the specified frequencies provides assurance that the Reactor trip and the Engineered Safety Features actuation



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 93 TO FACILITY OPERATING LICENSE NO. NPF-42
WOLF CREEK NUCLEAR OPERATING CORPORATION
WOLF CREEK GENERATING STATION
DOCKET NO. 50-482

1.0 INTRODUCTION

By letter dated August 22, 1995, 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 changes would revise the requirements of TS 3.3.1 and TS 3.3.2 and relocate Tables 3.3-2 and 3.3-5 and applicable Bases discussions, which provide the response time limits for the reactor trip system (RTS) and the engineered safety features actuation system (ESFAS) instruments, from the TS to the Updated Safety Analysis Report (USAR). The licensee has stated that the next USAR change request will include these changes. The NRC provided guidance to all holders of operating licenses or construction permits for nuclear power reactors on the proposed TS changes in Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993.

2.0 BACKGROUND

The NRC staff undertook efforts in the early 1980s to address problems related to the content of nuclear power plant technical specifications. These projects have resulted in the issuance of various reports, proposed rulemakings, and Commission policy statements. Line item improvements became a mechanism for technical specification improvement as part of the implementation of the Commission's interim policy statement on technical specification improvements published on February 6, 1987 (52 FR 3788). The final Commission policy statement on technical specification improvements was published July 22, 1993 (58 FR 39132). The final policy statement provided criteria which can be used to establish more clearly the framework for technical specifications. These criteria were subsequently incorporated into the regulations by an amendment to 10 CFR 50.36, 60 FR 36953 (July 19, 1995). The staff has maintained the line item improvement process, through the issuance of generic letters, in order to improve the content and consistency of technical specifications and to reduce the licensee and staff resources required to process amendments related to those specifications being relocated from the TS to other licensee documents as a result of the implementation of the revised requirements of 10 CFR 50.36.

Section 50.36 of Title 10 of the Code of Federal Regulations establishes the regulatory requirements for licensees to include technical specifications as part of applications for operating licenses. The rule requires that technical specifications include items in five specified categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. In addition, the Commission's final policy statement on technical specification improvements and other Commission documents provide guidance regarding the required content of technical specifications. The fundamental purpose of the technical specifications, as described in the Commission's final policy statement, is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety by identifying those features that are of controlling importance to safety and establishing on them certain conditions of operation which cannot be changed without prior Commission approval.

The Commission's final policy statement recognized, as had previous statements related to the staff's technical specification improvement program, that implementation of the policy would result in the relocation of existing technical specification requirements to licensee-controlled documents such as the USAR. Those items relocated to the USAR would in turn be controlled in accordance with the requirements of 10 CFR 50.59, "Changes, tests and experiments." Section 50.59 of Title 10 of the Code of Federal Regulations provides criteria to determine when facility or operating changes planned by a licensee require prior Commission approval in the form of a license amendment in order to address any unreviewed safety questions. NRC inspection and enforcement programs also enable the staff to monitor facility changes and licensee adherence to USAR commitments and to take any remedial action that may be appropriate.

3.0 EVALUATION

The licensee has proposed changes to TS 3.3.1 and TS 3.3.2 that remove the references to Tables 3.3-2 and 3.3-5 and delete these tables from the TS. The licensee committed to relocate the tables on response time limits to the USAR in the next periodic update.

Tables 3.3-2 and 3.3-5 contain the values of the response time limits for the RTS and ESFAS instruments. The limiting conditions for operation for the RTS and ESFAS instrumentation specify these systems shall be operable with the response times as specified in these tables. These limits are the acceptance criteria for the response time tests performed to satisfy the surveillance requirements of TS 4.3.1.3 and TS 4.3.2.3 for each applicable RTS and ESFAS trip function. These surveillances ensure that the response times of the RTS and ESFAS instruments are consistent with the assumptions of the safety analyses performed for design basis accidents and transients. The changes associated with the implementation of Generic Letter 93-08 involve only the relocation of the RTS and ESFAS response time tables but retain the surveillance requirement to perform response time testing. The USAR will now

contain the acceptance criteria for the required RTS and ESFAS response time surveillances. Because it does not alter the TS requirements to ensure that the response times of the RTS and ESFAS instruments are within their limits, the staff has concluded that relocation of these response time limit tables from the TS to USAR is acceptable.

The staff's determination is based on the fact that the removal of the specific response time tables does not eliminate the requirements for the licensee to ensure that the protection instrumentation is capable of performing its safety function. Although the tables containing the specific response time requirements are relocated from the technical specifications to the USAR, the licensee must continue to evaluate any changes to response time requirements in accordance with 10 CFR 50.59. Should the licensee's determination conclude that an unreviewed safety question is involved, due to either (1) an increase in the probability or consequences of accidents or malfunctions of equipment important to safety, (2) the creation of a possibility for an accident or malfunction of a different type than any evaluated previously, or (3) a reduction in the margin of safety, NRC approval and a license amendment would be required prior to implementation of the change.

The staff's review concluded that 10 CFR 50.36 does not require the response time tables to be retained in technical specifications. Requirements related to the operability, applicability, and surveillance requirements, including performance of testing to ensure response times, for RTS and ESFAS systems are retained due to those systems' importance in mitigating the consequences of an accident. However, the staff determined that the inclusion of specific response time requirements for the various instrumentation channels and components addressed by Generic Letter 93-08 was not required. The response times are considered to be an operational detail related to the licensee's safety analyses and are adequately controlled by the requirements of 10 CFR 50.59. Therefore, the continued processing of license amendments related to revisions of the affected instrument or component response times, where the revisions to those requirements do not involve an unreviewed safety question under 10 CFR 50.59, would afford no significant benefit with regard to protecting the public health and safety. Further, the response time requirements do not constitute a condition or limitation on operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, in that the ability of the RTS and ESFAS systems to perform their safety functions is not adversely impacted by the relocation of the response time tables from the TS to the USAR.

In addition to removing the response times from the TS, the licensee is modifying TS Bases Sections 3/4.3.1 and 3/4.3.2 to reflect these changes and has stated that the plant procedures for response time testing include acceptance criteria that reflect the RTS and ESFAS response time limits in the tables being relocated to the USAR. These changes are acceptable in that they merely constitute administrative changes required to implement the TS change discussed above.

These TS changes are consistent with the guidance provided in Generic Letter 93-08 and the TS requirement of 10 CFR 50.36. The staff has determined that the proposed changes to the TS for Wolf Creek Generating Station are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Kansas State Official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC 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 exposure. 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 (60 FR 49950). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 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.

6.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: W. Reckley
E. A. Brown

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