

August 3, 1995

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

Dear Mr. Carns:

SUBJECT: WOLF CREEK GENERATING STATION - AMENDMENT NO. 88 TO FACILITY
OPERATING LICENSE NO. NPF-42 (TAC NO. M92982)

The Commission has issued the enclosed Amendment No. 88 to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station. The amendment consists of changes to the License Condition in response to your application dated July 28, 1995.

The amendment deletes the license condition contained in Attachment 1 that required the pump in the emergency diesel generator (EDG) keepwarm system to satisfy American Society of Mechanical Engineers (ASME) Code, Section III, Class 3 requirements.

Your letter of July 28, 1995, requested that this amendment be treated as an exigent because of the failure of the keepwarm pump on the A EDG and because neither repair parts nor a complete pump that satisfies the ASME Code requirements are available. In order to maintain the A EDG operable, it is being started periodically to maintain lube oil temperature above the minimum requirement. Because this requires operating the A EDG every 3-6 hours, the staff, on July 28, 1995, approved a verbal Notice of Enforcement Discretion, allowing the installation of a non-code pump in the keepwarm system and followed with a letter dated August 1, 1995. Also, the staff has processed this request as an emergency change instead of an exigent.

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. 88 to NPF-42
2. Safety Evaluation

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 3, 1995

Mr. Neil S. Carns
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
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Your letter of July 28, 1995, requested that this amendment be treated as an exigent because of the failure of the keepwarm pump on the A EDG and because neither repair parts nor a complete pump that satisfies the ASME Code requirements are available. In order to maintain the A EDG operable, it is being started periodically to maintain lube oil temperature above the minimum requirement. Because this requires operating the A EDG every 3-6 hours, the staff, on July 28, 1995, approved a verbal Notice of Enforcement Discretion, allowing the installation of a non-code pump in the keepwarm system and followed with a letter dated August 1, 1995. Also, the staff has processed this request as an emergency change instead of an exigent.

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,

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

Enclosures: 1. Amendment No. 88 to NPF-42
2. Safety Evaluation

cc w/encls: See next page

Mr. Neil S. Carns

- 2 -

cc w/enc1:

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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. 88
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 28, 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.

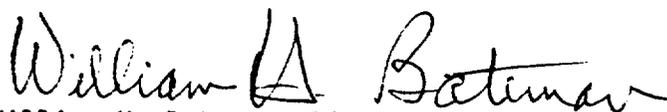
2. Accordingly, Paragraph 2.C.(1) of Facility Operating License No. NPF-42 is hereby amended to read as follows:

(1) Maximum Power Level

The Operating Corporation is authorized to operate the facility at reactor core power levels not in excess of 3565 megawatts thermal (100% power) in accordance with the conditions specified herein.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



William H. Bateman, Director
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Pages 3 and 7 of License

Date of Issuance: August 3, 1995

*Pages 3 and 7 are attached, for convenience, for the composite license to reflect these changes. Please remove pages 3, 7, and Attachment 1 of the existing license and replace with the attached pages 3 and 7.

- (1) Pursuant to Section 103 of the Act and 10 CFR Part 50 "Domestic Licensing of Production and Utilization Facilities," the Operating Corporation, to possess, use and operate the facility at the designated location in Coffey County, Kansas, in accordance with the procedures and limitations set forth in this license;
- (2) KG&E, KCPL and KEPCO to possess the facility at the designated location in Coffey County, Kansas, in accordance with the procedures and limitations set forth in this license;
- (3) The Operating Corporation, pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended.
- (4) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. 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 I 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; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The Operating Corporation is authorized to operate the facility at reactor core power levels not in excess of 3565 megawatts thermal (100% power) in accordance with the conditions specified herein.

- 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

Date of Issuance: June 4, 1985



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 88 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 July 28, 1995, Wolf Creek Nuclear Operating Corporation (WCNOC) (the licensee) requested changes to the Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS). The proposed changes would delete the license condition stated in 2.C.(1), Attachment 1, that requires the pump in the keepwarm system of the emergency diesel generators (EDGs) to satisfy the requirements of the American Society of Mechanical Engineers (ASME) Code, Section III, Class 3 (ASME Code) requirements.

2.0 BACKGROUND

The purpose of the lube oil keepwarm pump is to circulate lube oil through the EDG while it is in the standby mode. This provides the following functions: (1) maintain the oil in the sump in a warm condition to help ensure the EDG will start within the required 12 seconds, (2) prelubricate the essential engine components, and (3) maintain the oil purity by continuous filtration (bypass flow) of the lube oil. The first condition is directly related to TS requirements, while the later two are measures to reduce unnecessary wear during surveillance tests and to help ensure long-term performance of the EDG.

On July 27, 1995, the keepwarm pump for A EDG failed. Following that failure, the A EDG was declared inoperable and Technical Specification (TS) 3.8.1.1, Action b was entered. This TS allows 72 hours to complete the repairs and return the A EDG to operable status or the unit would be required to be shut down. The declaration of inoperability maximized the safety of personnel working on the keepwarm pump.

On July 28, 1995, the mechanical overspeed trip device on the B EDG actuated due to a possible governor adjustment problem and the B EDG was declared inoperable and TS 3.8.1.1, Action f, was entered. This requires that at least one EDG be returned to operable status within 2 hours or the unit would have to be shutdown.

A EDG was then started and ran until the lube oil temperature was returned to the required temperature band. The A EDG was then declared operable, with the failed keepwarm pump isolated. WCNOC remained in TS 3.8.1.1, Action b, because of the failure on the B EDG. In order to maintain the A EDG operable,

the A EDG is started periodically and the lube oil warmed. This requires starting the engine every 3-6 hours.

The licensee has tried to obtain a replacement pump and repair part that satisfy the requirements of the ASME Code. However, the original manufacturer (Crane-Deming) is no longer in business and no other pump manufacturer is producing a pump that satisfies the ASME Code requirements. Replacement pumps are available that satisfy the performance requirements and are produced under a quality assurance program, but do not satisfy the ASME Code requirements. Because of this unavailability of replacement parts or pumps and the necessity of periodic operation of the A EDG to satisfy operability requirements, on July 28, 1995, the licensee requested the staff to exercise enforcement discretion to allow the installation of a non-ASME Code pump. On July 28, 1995, the staff verbally approved the licensee's request and followed with a letter dated August 1, 1995.

3.0 EVALUATION

The licensee has made a concerted effort to find replacement parts and complete pumps that satisfy the ASME Code requirements. The licensee has also stated that the operating history of the ASME Code pumps has shown them to be less reliable than the non-ASME pumps initially installed by the EDG vendor. These non-ASME pumps were temporarily utilized at WCGS during startup of the unit. However, a license condition was added to the license that required the replacement of the non-ASME keepwarm pumps with pumps that satisfied the ASME Code requirements following the first refueling outage.

The licensee has proposed to delete the license condition that requires the replacement of keepwarm pumps with pumps that satisfy the ASME Code requirements. In lieu of meeting the ASME Code, the replacement pumps would have the same performance characteristics, are seismically qualified, hydrostatically tested, and have been manufactured under an approved quality assurance program, essentially one step below an ASME Code pump.

Regulatory Guide (RG) 1.26, Revision 3, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants," gives guidance on classification of components for application of ASME Code requirements. Section B of RG 1.26 states that it does not cover systems such as instrument and service air, diesel engine and its generators and auxiliary support systems, diesel fuel, emergency and normal ventilation, fuel handling, and radioactive waste management systems, but that these systems should be designed, fabricated, erected, and tested to quality standards commensurate with the safety function to be performed. Section C.2.b of RG 1.26 requires that cooling water and seal water systems or portions of those systems important to safety that are designed for functioning of components and systems important to safety, such as reactor coolant pumps, diesels, and control rooms, be Quality Group C (ASME Class 3). The keepwarm pumps are not an integral component of the cooling water or seal water support systems for the EDGs. The licensee concluded that the keepwarm pumps can be considered Quality Group D components that are seismic Category 1 qualified.

Based on the above, the staff concludes that the deletion of the license condition requiring the installation, in the keepwarm system of the EDGs at WCGS, is acceptable. The pumps in the keepwarm system of the EDGs at WCGS shall be seismic, Category 1, qualified, designed, fabricated, erected and hydrostatically tested to an approved quality standard, commensurate to the safety function to be performed.

4.0 EMERGENCY CIRCUMSTANCES

The licensee in its July 28, 1995, letter requested this amendment be processed as an exigent amendment. However, the staff is processing this as an emergency amendment. Following the failure of the A EDG keepwarm pump and the subsequent failure of the B EDG governor, the licensee restored the operability of the A EDG by running the diesel to warm up the lube oil to above the minimum temperature required to help ensure a 12-second start. Since that time the A EDG has been operated periodically to maintain the lube oil temperature above the minimum temperature requirements. If the A EDG was not restored to operable status and maintained in an operable status, the unit would have to be shutdown within 2 hours.

Even before this pump failed, the licensee has been trying to obtain a replacement pump and repair parts that satisfy the requirements of the ASME Code. However, the original manufacturer (Crane-Deming) is no longer in business and no other pump manufacturer is producing a pump that satisfies the ASME Code requirements. Replacement pumps are available that satisfy the performance requirements and are produced under a quality assurance program, but do not satisfy the ASME Code requirements. The staff is satisfied that the licensee has been diligent in pursuing an ASME Code pump.

Even with the B EDG restored to operable status, only 72 hours would be available before a plant shutdown would be required, unless the operability of the A EDG was maintained. While the periodic operation of the A EDG to maintain operability is acceptable for a short period, extended operation in that mode is not desirable. Therefore, the staff has made a determination to process this application as an emergency amendment request pursuant to 10 CFR 50.91(a)(5).

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations, if operation of the facility, in accordance with the amendment would not:

- (1) Involve a significant increase in the probability or consequences of any accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

This amendment has been evaluated against the standards in 10 CFR 50.92. It does not involve a significant hazards consideration because:

- (1) This proposed deletion of the license condition does not involve a significant increase in the probability or consequences of an accident previously evaluated since the proposed installation of a non-ASME keepwarm pump does not change the function or performance requirements for the emergency diesel generator as described in the Updated Safety Analysis Report (USAR) and technical specifications. The design of the non-ASME pump will be to the same performance requirements as the ASME pump. The emergency diesel generator and associated keepwarm pump will continue to perform in a manner consistent with the assumptions in the USAR. There will be no degradation in system performance, nor will there be an increase in the number of challenges to equipment assumed to function during an accident condition.
- (2) This proposed deletion of the license condition does not create the possibility of a new or different kind of accident from any previously evaluated since the non-ASME pump will be designed to the same performance requirements as the ASME pump. The emergency diesel generator and associated keepwarm pump will continue to perform in a manner consistent with the assumptions in the USAR. No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced. There will be no adverse effect or challenges imposed on any safety related system as a result of this emergency change to the operating license.
- (3) This proposed deletion of the license condition does not involve a significant reduction in the margin of safety since the non-ASME pump was designed to the same performance requirements as the ASME pump and will perform in a manner consistent with the assumptions in the USAR. The emergency diesel generator and associated keepwarm pump will continue to perform in a manner consistent with the assumptions in the USAR.

Accordingly, the Commission has determined that this amendment involves no significant hazards considerations.

6.0 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.

7.0 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 made a final no significant hazards consideration finding with respect to this amendment. 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.

8.0 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 Contributor: J. Stone

Date: August 3, 1995