September 1996

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. 102 TO FACILITY OPERATING LICENSE NO. NPF-42 (TAC NO. M93950)

Dear Mr. Carns:

The Commission has issued the enclosed Amendment No. 102 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consists of changes to the Technical Specifications (TS) in response to your application dated October 24, 1995, and superseded by application dated May 16, 1996.

The amendment adopts ASTM D3803-1989 as the laboratory testing standard for charcoal samples from the charcoal absorbers in the control room filtration system, control building pressurization system, and the auxiliary/fuel building emergency exhaust system. The output of the heaters in the control building pressurization system is reduced from a nominal 15kW to a nominal 5kW and the acceptance criterion for the testing of the charcoal absorbers is changed.

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. 102 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

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 102
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License No. NPF-42 filed by the Wolf Creek Nuclear Operating Corporation (the Corporation), dated October 24, 1995, and superseded by letter dated May 16, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules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. 102, 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 and shall be implemented within 120 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

James C. Stone

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: September 4, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 102

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.

REMOVE	INSERT
3/4 7-15	3/4 7-15
3/4 7-16	3/4 7-16
3/4 9-18	3/4 9-18

SURVEILLANCE REQUIREMENTS (Continued)

c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:

1) Verifying that the Control Room Emergency Ventilation System satisfies the in-place penetration and bypass leakage testing acceptance criteria; of less than 1% for HEPA filters and 0.05% for charcoal adsorbers and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 2000 cfm ±10% for the Filtration System and 2200 cfm ±10% for the Pressurization System with 750 cfm ±10% going through the Pressurization System filter adsorber unit;

2) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 70% relative humidity, for a methyl iodide penetration of less than 2%, and

3) Verifying system flow rate of 2000 cfm ±10% at greater than or equal to 6.6 inches W.G. (dirty filter) for the Filtration System and 2200 cfm ±10% at greater than or equal to 3.6 inches W.G. (dirty filter) for the Pressurization System with 750 cfm ±10% going through the Pressurization System filter adsorber unit during system operation when tested in accordance with ANSI N510-1980.

d. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 70% relative humidity, for a methyl iodide penetration of less than 2%;

e. At least once per 18 months by:

1) Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6.6 inches Water Gauge while operating the system at a flow rate of 2000 cfm ±10% for the Filtration System and less than 3.6 inches Water Gauge while operating the system at a flow rate of 750 cfm ±10% for the Pressurization System filter adsorber unit,

2) Verifying that on a Control Room Ventilation Isolation or High Gaseous Radioactivity test signal, the system automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks,

SURVEILLANCE REQUIREMENTS (Continued)

3) Verifying that the system maintains the control room at a positive pressure of greater than or equal to 1/4 inch Water Gauge relative to the outside atmosphere during system operation, and

4) Verifying that the Pressurization System filter adsorber unit heaters dissipate 5 ± 1 kW in the Pressurization System when tested in accordance with ANSI N510-1975.

f. After each complete or partial replacement of a HEPA filter bank, by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing criteria of less than 1% in accordance with ANSI N510-1975 (however Prerequisite Testing, Sections 8 and 9 shall be in accordance with ANSI N510-1980) for a DOP test aerosol while operating the system at a flow rate of 2000 cfm ±10% for the Filtration System and 750 cfm ±10% for the Pressurization System filter adsorber unit; and

g. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing criteria of less than 0.05% in accordance with ANSI N510-1975 (however Prerequisite Testing, Sections 8 and 9 shall be in accordance with ANSI N510-1980) for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 2000 cfm ±10% for the Filtration System and 750 cfm ±10% for the Pressurization System filter adsorber unit.

REFUELING OPERATIONS

3/4.9.13 EMERGENCY EXHAUST SYSTEM - FUEL BUILDING

LIMITING CONDITION FOR OPERATION

3.9.13 Two independent Emergency Exhaust Systems shall be OPERABLE.

APPLICABILITY: Whenever irradiated fuel is in the spent fuel pool.

ACTION:

a. With one Emergency Exhaust System inoperable, fuel movement within the fuel storage areas or crane operation with loads over the fuel storage areas may proceed provided the OPERABLE Emergency Exhaust System is in operation and discharging through at least one train of HEPA filters and charcoal adsorbers.

b. With no Emergency Exhaust System OPERABLE, suspend all operations involving movement of fuel within the fuel storage areas or crane operation with loads over the fuel storage areas until at least one Emergency Exhaust System is restored to OPERABLE status.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.13 The above required Emergency Exhaust Systems shall be demonstrated OPERABLE:

a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating;

b. At least once per 18 months, or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system, by:

1) Verifying that the Emergency Exhaust System satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1% for HEPA filters and 0.05% for charcoal adsorbers and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 6500 cfm ±10%.

SURVEILLANCE REQUIREMENTS (Continued)

2) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 70% relative humidity, for a methyl iodide penetration of less than 2%, and

3) Verifying a system flow rate of 6500 cfm ±10% at ≥ 4.7 inches W.G. (dirty filter) during system operation when tested in accordance with ANSI N510-1980.

c. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 70% relative humidity, for a methyl iodide penetration of less than 2%, and

d. At least once per 18 months by:

1) Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than or equal to 4.7 inches Water Gauge while operating the system at a flow rate of 6500 cfm ±10%.

2) Verifying that the heaters dissipate 37 ± 3 kW when tested in accordance with ANSI N510-1975.

e. After each complete or partial replacement of a HEPA filter bank, by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1% in accordance with ANSI N510-1975 (however Prerequisite Testing, Sections 8 and 9 shall be in accordance with ANSI N510-1980) for a DOP test aerosol while operating the system at a flow rate of 6500 cfm ±10%; and

f. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1975 (however Prerequisite Testing, Sections 8 and 9 shall be in accordance with ANSI N510-1980) for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 6500 cfm ±10%.

g. At least once per 18 months by:

1) Verifying that on a Fuel Building Exhaust Gaseous Radioactivity-High test signal, the system automatically starts (unless already operating) and directs its exhaust flow through the HEPA filters and charcoal adsorber banks and isolates the normal fuel building exhaust flow to the auxiliary/fuel building exhaust fan;

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 102 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 October 24, 1995, and superseded by letter dated May 16, 1996, 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 Technical Specification (TS) 3/4.7.6, "Control Room Emergency Ventilation System (CREVS);" TS 3/4.7.7, "Auxiliary Building Emergency Exhaust System;" and TS 3/4.9.13, "Fuel Building Emergency Exhaust System." The proposed TS changes pertain to the laboratory testing of the representative carbon samples taken from the charcoal adsorbers in the ventilation systems, the methyl iodide penetration limits for the test, and the output rating of the charcoal filter adsorber unit heater in the pressurization system portion of the CREVS.

2.0 EVALUATION

The proposed TS amendment changes the testing requirements used to determine the operability of the charcoal in the engineered safety feature (ESF) air handling units. The charcoal is provided to remove iodine from the air as it passes through the air handling units. The reduction in heater output in the pressurization system represents a change in the physical design of the plant as reflected in the Updated Final Safety Analysis Report (UFSAR). Also, Regulatory Guide (RG) 1.52, Revision 2, "Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants," and military standard RDT M-16-1T are referenced in the UFSAR for the testing of the charcoal filters and will require updating. The TS Bases are not affected.

WCGS TS Surveillance Requirements 4.7.6.c.2, 4.7.6.d, 4.9.13.b.2, and 4.9.13.c presently specify regulatory position C.6.a of RG 1.52, Revision 2, as the requirement for the laboratory testing of the charcoal. RG 1.52 references ANSI N509-1976, "Nuclear Power Plant Air Cleaning Units and Components." ANSI N509-1976 specifies that testing is to be performed in accordance with paragraph 4.5.3 of Military Specification RDT M 16-1T, "Gas Phase Adsorbents

for Trapping Radioactive Iodine and Iodine Components" (year not specified). The essential elements of this test are:

- 70 percent relative humidity (RH) for air filtration systems designed to control the RH to 70 percent (i.e., filtration systems with heaters)
- A 5 hour pre-test charcoal sample equilibration at 25°C and 70 percent RH
- A 2 hour injection of challenge gas at a test medium temperature of 80°C and 70 percent RH
- A 2 hour post-test sweep at 25°C and 70 percent RH
- Methyl iodide penetration of less than 1 percent

The licensee proposed to change WCGS TS Surveillance Requirements 4.7.6.c.2, 4.7.6.d, 4.9.13.b.2, and 4.9.13.c to reference ASTM D 3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," as the requirement for the laboratory testing of the charcoal. ASTM D 3803-1989 is updated guidance based on ASTM D 3803-1979, which is updated guidance based on RDT M 16-1T. The essential elements of the proposed TS change for testing per ASTM D 3803-1989 are:

- 70 percent RH
- A 2 hour pre-test thermal stabilization at 30°C
- A 16 hour pre-test charcoal sample equilibration at 30°C and 70 percent RH
- A 2 hour equilibration of the sample at 30°C and 70 percent RH
- A 1 hour injection of challenge gas at a test medium temperature of 30°C and 70 percent RH
- A 1 hour post-test sweep at 30°C and 70 percent RH
- Methyl iodide penetration less than 2 percent

The major differences between the current TS and the proposed TS change requirements for carbon testing are:

- A test temperature of 30°C versus 25°C, 80°C, 25°C
- A total pre-test equilibration of 18 hours versus 5 hours
- A methyl iodide penetration of 2 percent versus 1 percent
- Smaller tolerances versus larger tolerances

These differences will be addressed individually and will be shown to be more conservative than the present TS requirement.

As stated above, the licensee proposed to challenge the representative carbon samples at 30°C rather than 80°C. Information Notice 86-76, "Problems Noted in Control Room Emergency Ventilation Systems," indicated that laboratory testing of charcoal at a temperature higher than that expected during the course of an accident could result in an overprediction of the capability of the charcoal to remove methyl iodine. The quantity of water retained by charcoal (carbon) is dependent on temperature. Generally, the higher the temperature the less water retained. The water retained by the carbon decreases the efficiency of the carbon to adsorb other contaminants. At 30°C

and 95 percent RH, carbon will retain about 40 weight percent water. At 80°C and 95 percent RH, carbon retains only about 2 to 3 weight percent water. Therefore, the lower temperature test medium of the proposed TS will yield more conservative results than the present TS.

ASTM D-3803-1989 specifies a test temperature of 30°C for both the pre- and post-test sweep instead of 25°C. There is little difference in the adsorption behavior of carbon between these two temperatures. The 25°C parameter is more conservative. The increase from 25°C to 30°C does not represent a significant decrease in the test results for the CREVS.

Pre-test humidity equilibration is achieved by sweeping air of the appropriate humidity through the test carbon. The present TS reference to ANSI N509-1976 (RDT M 16-1T) requires the charcoal to be equilibrated to 25°C and 70 percent RH. The methyl iodide test medium would then be instantaneously introduced at 80°C. Testing the charcoal with such thermal step changes is technically incorrect because it causes condensation on the charcoal sample. Condensation on the charcoal sample itself ("wetting the bed") makes the test invalid. This is supported by paragraph 12.41. of ASTM D-3803-1979, which states with respect to relative humidity of the test medium that "tests at saturation or above give very erratic results." Because of this, the ASTM D-3803-1989 standard includes a 2 hour pre-test thermal-only stabilization at 30°C and specifies a temperature of 30°C for all phases of the test. Therefore, ASTM D-3803-1989 is a better test because it solves the problem of the formation of condensation on the charcoal sample.

The ASTM D-3803-1989 standard is more stringent than the RDT M 16-1T standard since it has smaller tolerances that result in more acceptable reproducibility of the test and it requires that the carbon sample be pre-test equilibrated for a much longer duration. The longer pre-equilibration is conservative since it will completely saturate the representative carbon sample to the condition to which the subject charcoal adsorbers are expected to be exposed during design basis conditions. During the pre-equilibration, the charcoal is exposed to a flow of air controlled at the test temperature and RH before the challenge gas is fed through the charcoal. The purpose of the pre-equilibration phase of the test is to ensure that the charcoal has stabilized at the specified test temperature and RH for a period of time which results in the charcoal adsorbing all the available moisture before the charcoal is challenged with methyl iodide. Therefore, the measured methyl iodide removal efficiency is lower than it is if pre-equilibration is not performed. Hence, the proposed testing in accordance with ASTM D-3803-1989 standard would result in a more realistic prediction of the capability of the charcoal.

The licensee proposed a higher limit for the methyl iodide penetration through carbon samples taken from the charcoal adsorbers while still claiming an adsorption efficiency of 95 percent for radioiodine. Although the proposed 2 percent penetration acceptance criterion is less conservative than the current 1 percent penetration, the RDT M 16-1T standard when used with a 1 percent penetration is less conservative than the ASTM D 3803-1989 standard when used with a 2 percent penetration because the ASTM standard is a much more stringent test. Therefore, the staff concludes that an adequate safety

margin exists when the proposed ASTM D 3803-1989 standard is used to credit a charcoal filter adsorption efficiency of 95 percent for radioiodine to conform with the 10 CFR Part 100 and GDC 19 limits.

With regard to the CREVS heaters, the licensee proposed to change the output rating of the pressurization system filter adsorber unit heaters from 15 ± 2 kW to 5 ± 1 kW. The heaters are designed to reduce the RH of the influent air entering the charcoal filter beds from a design ambient condition of 100 percent RH to ≤ 70 percent RH. Higher moisture content of the carbon results in lower adsorption of radioiodines. At a constant temperature the weight percent of water adsorbed by the carbon increases with increasing RH. Therefore, the heaters help ensure that the charcoal adsorbers remain sufficiently dry to remove radioiodine.

By letter dated May 16, 1996, the licensee submitted a revised calculation of the original pressurization system filter adsorber unit heater design basis calculation. This calculation documented that this system only requires 3.13kW to maintain the influent air ≤ 70 percent RH. The calculation assumed a worst-case ambient condition of 97°F and 100 percent RH while taking into account the possibility of a degraded heater voltage supply. The staff reviewed this calculation and found it acceptable. Therefore, the staff finds that the licensee's proposed heater rating of 5kW ± 1kW is also acceptable.

The requested changes revise WCGS TS Surveillance Requirements 4.7.6.c.2, 4.7.6.d, 4.9.13.b.2, and 4.9.13.c for charcoal filter laboratory testing such that existing flawed test methodology in the TS will reflect the currently utilized acceptable test methodology in accordance with industry standards. The staff has evaluated this change and concludes that the testing methodology proposed by the licensee adequately demonstrates the operability of the air handling units and is therefore acceptable. In addition, the staff has determined that the proposed heater rating of 5kW ± 1kW is also acceptable.

3.0 CONCLUSION

The requested changes to TS 3/4.7.6, "Control Room Emergency Ventilation System (CREVS)," TS 3/4.7.7, "Auxiliary Building Emergency Exhaust System," and TS 3/4.9.13 "Fuel Building Emergency Exhaust System," revise the surveillance requirements for the charcoal filter laboratory testing. The staff has determined that using the proposed ASTM D-3803-1989 testing standard at 30°C, 70 percent RH, and a 2 percent methyl iodide penetration will result in a more realistic prediction of the capability of the charcoal. In addition, the licensee also requested to change TS 3/4.7.6 to revise the output rating of the charcoal filter adsorber unit heater in the pressurization system portion of the CREVS. The staff has determined that the proposed heater rating of 5kW ± 1kW will maintain the influent air ≤ 70 percent RH even with the worst-case ambient conditions of 97°F and 100 percent RH and while taking into account a degraded heater voltage supply. Therefore, the staff concludes that the testing methodology and the heater output rating proposed by the licensee adequately demonstrate the operability of the CREVS, the auxiliary building emergency exhaust system, and the fuel building emergency exhaust system, and 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 surveillance requirements. 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 (61 FR 28622). 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 Contributor: John Segala

Date: September 4, 1996