

October 7, 1997

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, Kansas 66839

SUBJECT: WOLF CREEK GENERATING STATION - AMENDMENT NO. 112 TO FACILITY
OPERATING LICENSE NO. NPF-42 (TAC NO. M99601)

Dear Mr. Maynard:

The Commission has issued the enclosed Amendment No. 112 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 September 6, 1997.

The amendment allows the testing of certain contacts in the emergency diesel generator load sequencer to be done with the unit at power (Mode 1) and provides an additional 24 hours to the time allowed by TS 4.0.3 to complete the testing.

Your letter of September 6, 1997, requested that this amendment be treated as an emergency because without the requested relief, the unit would have to be shutdown to accomplish the tests. On September 5, 1997, the staff approved a verbal Notice of Enforcement Discretion, which allowed the testing to be completed with the plant at power and provided an additional 24 hours to complete the testing. This was followed by a letter dated September 12, 1997. Because the testing has been completed, the staff processed this amendment request as an exigent change instead of an emergency.

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
Kristine M. Thomas, 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. 112 to NPF-42
2. Safety Evaluation

cc w/encls: See next page

*For previous concurrences see attached ORC

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 7, 1997

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President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
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Kristine M. Thomas

Kristine M. Thomas, Project Manager
Project Directorate IV-2
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Office of Nuclear Reactor Regulation

Docket No. 50-482

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2. Safety Evaluation

cc w/encls: See next page

Mr. Otto L. Maynard

- 2 -

October 7, 1997

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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. 112
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 September 6, 1997, 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. 112, 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

Kristine M Thomas

Kristine M. Thomas, 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: October 7, 1997

ATTACHMENT TO LICENSE AMENDMENT NO. 112

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

3/4 8-4
3/4 8-5

INSERT

3/4 8-4
3/4 8-5

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:

a. At least once per 31 days on a STAGGERED TEST BASIS by:

- 1) Verifying the fuel oil transfer pump starts on low level in the day tank standpipe,
- 2) Verifying the fuel level in the fuel storage tank,
- 3) Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day tank,
- 4) Verifying the diesel starts** and obtains a voltage of $4160 + 160 - 420$ volts, and a frequency of 60 ± 1.2 Hz. The diesel generator can be slow started and allowed to reach rated speed at a rate that is selected to minimize stress and wear.
- 5) Verifying the generator is synchronized, gradually loaded to an indicated 5580 to 6201 kW*** for at least 60 minutes, and until temperature equilibrium is attained. The rate of loading and unloading of the generator during this test should be gradual, based upon minimizing stress and wear on the diesel generator, and
- 6) Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.

b. At least once per 31 days by checking for and removing accumulated water from the day tanks;

c. At least once per 31 days by checking for and removing accumulated water from the fuel oil storage tanks;

**This test shall be preceded by an engine prelube period and/or other warmup procedures recommended by the manufacturer so that the mechanical stress and wear on the diesel engine is minimized.

***This band is meant as guidance to avoid routine overloading of the engine. Loads outside of this band for special testing under direct monitoring or momentary variations due to changing bus loads shall not invalidate this test.

SURVEILLANCE REQUIREMENTS (Continued)

- d. By verifying fuel oil properties of new fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.
- e. By verifying fuel oil properties of stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.
- f. At least once per 184 days verify each diesel generator starts from standby conditions* and achieves in less than or equal to 12 seconds, a voltage of 4160 + 160 - 420 volts, and a frequency of 60 ± 1.2 Hz using one of the following signals:
 - 1) Manual, or
 - 2) Simulated loss-of-offsite power by itself, or
 - 3) Safety injection test signal.
- g. At least once per 18 months, during shutdown, by:
 - 1) Verifying each diesel generator operating at a power factor between 0.8 and 0.9 does not trip on overspeed and voltage does not exceed 4784 volts and frequency does not exceed 65.4 Hz following a load rejection of 5580 to 6201 kW,**
 - 2) Verifying on an actual or simulated loss-of-offsite power signal (LOOP)**:
 - a) De-energization of emergency buses;
 - b) Load shedding of emergency buses;
 - c) The diesel generator auto-starts from standby conditions*** and:
 - 1) energizes permanently connected loads within 12 seconds.
 - 2) energizes the auto-connected shutdown loads through the shutdown sequencer,****
 - 3) maintains steady state voltage at 4160 + 160 - 420 volts.

* This test shall be preceded by an engine prelube period so that the mechanical stress and wear on the diesel engine is minimized.

** This surveillance shall not be performed in Modes 1 or 2 and credit may be taken for unplanned events that satisfy this requirement.

*** This test shall be preceded by an engine prelube period and/or other warmup procedures recommended by the manufacturer so that the mechanical stress and wear on the diesel engine is minimized.

**** One-time testing of the blocking/time delay contacts associated with relays K1102, K4102, K1117, K4117, K1118, and K4118 at power is permitted. The provisions of Technical Specification 4.0.3 to complete testing within 24 hours is extended to 48 hours to permit completion of the testing of these contacts by 1906 hours on September 6, 1997.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 4) maintains steady state frequency at 60 ± 1.2 Hz, and
 - 5) operates for greater than or equal to 5 minutes while the generator is loaded with the shutdown loads.
- 3) Verifying on an actual or simulated Safety Injection Actuation Signal (SIAS)** that each diesel generator auto-starts from the standby condition* and:
- a) achieves a voltage of $4160 + 160 - 420$ volts in less than or equal to 12 seconds after the auto-start signal;
 - b) achieves a frequency of 60 ± 1.2 Hz in less than or equal to 12 seconds after the auto-start signal;
 - c) operates on standby for greater than or equal to 5 minutes;
 - d) the offsite power source energizes the auto-connected (accident) loads through the LOCA sequencer.***
- 4) Verifying on a simulated loss-of-offsite power in conjunction with a simulated Safety Injection Actuation Signal (SIAS)** that each diesel generator auto-starts from the standby condition* and:
- a) achieves a voltage of $4160 + 160 - 420$ volts in less than or equal to 12 seconds after the auto-start signal;
 - b) achieves a frequency of 60 ± 1.2 Hz in less than or equal to 12 seconds after the auto-start signal;
 - c) de-energization of the emergency busses and load shedding from the emergency busses;
 - d) energizes the emergency busses with permanently connected loads within 12 seconds, energizes the auto-connected emergency (accident) loads through the LOCA sequencer.***
 - e) operates for greater than or equal to 5 minutes while its generator is loaded with emergency loads.

* This test shall be preceded by an engine prelube period and/or other warmup procedures recommended by the manufacturer so that the mechanical stress and wear on the diesel engine is minimized.

** This surveillance shall not be performed in Modes 1 or 2 and credit may be taken for unplanned events that satisfy this requirement.

*** One-time testing of the blocking/time delay contacts associated with relays K1102, K4102, K1117, K4117, K1118, and K4118 at power is permitted. The provisions of Technical Specification 4.0.3 to complete testing within 24 hours is extended to 48 hours to permit completion of the testing of these contacts by 1906 hours on September 6, 1997.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 5) Verifying each diesel generator's automatic trips are bypassed upon the simulated SIAS and LOOP combined test** except:
 - a) High jacket coolant temperature;
 - b) Engine overspeed;
 - c) Low lube oil pressure;
 - d) High crankcase pressure;
 - e) Start failure relay;
 - f) Generator differential current.

- 6) Verifying full-load carrying capability of the diesel generator at a power factor between 0.8 and 0.9 for an interval of not less than 24 hours at 5580 to 6201 kW (indicated)**. Verify the diesel generator operates for 2 hours loaded to an indicated 6600 to 6821 kW if auto connected loads increase above 6201 kW. The generator voltage and frequency shall be maintained within $4160 + 160 - 420$ volts and 60 ± 1.2 Hz during this test;****

- 7) Verifying the diesel generator's hot restart capability by operating the diesel generator for greater than or equal to 2 hours at an indicated load of 5580 to 6201 kW, shutting down the diesel generator and restarting it within 5 minutes. On restart, the diesel generator voltage and frequency shall be $4160 + 160 - 420$ volts and 60 ± 1.2 Hz within 12 seconds after the start signal;

- 8) Verifying the diesel generator's capability*** to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its standby status.

** This surveillance shall not be performed in Modes 1 or 2 and credit may be taken for unplanned events that satisfy this requirement.

*** This surveillance shall not be performed in Modes 1, 2, 3, or 4 and credit may be taken for unplanned events that satisfy this requirement.

**** This band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band for special testing under direct monitoring or momentary variations due to changing bus loads shall not invalidate this test.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 112 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 September 6, 1997, 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 add a footnote to Technical Specification Surveillance Requirements 4.8.1.1.2.g.2)c)2), 4.8.1.1.2.g.3)d) and 4.8.1.1.2.g.4)d). This footnote would (1) allow one-time testing of the blocking/time delay contacts associated with relays K1102, K4102, K1117, K4117, K1118, and K4118, at power, and (2) extend the provisions of Technical Specification 4.0.3 to complete testing within 24 hours to 48 hours, to permit completion of the testing of these contacts by 1906 hours on September 6, 1997.

2.0 BACKGROUND

On September 4, 1997, as a result of reviews undertaken in response to Generic Letter 96-01, "Testing of Safety Related Logic Circuits," and information received from another plant, Wolf Creek Nuclear Operating Corporation (WCNOC) determined that the existing surveillance testing procedures did not completely verify the operation of certain contacts in the emergency diesel generator sequencer. Specifically, it was discovered that certain relay contacts required to open have not been tested during performance of surveillance procedure STS KJ-001A/B, "Integrated Diesel Generator Safeguards Actuation Test Train A/B." The contacts in question are actuated by relays K1102, K4102, K1117, K4117, K1118 and K4118. The current testing process, implemented through STS KJ-001A/B, has not demonstrated the function of the contacts because there are other contacts in series that could also be open during the testing.

These relay contacts provide a blocking/time delay function for start of the component cooling water (CCW) pumps, essential service water (ESW) pumps, and the motor driven auxiliary feedwater (MDAFW) pumps. On a loss of offsite power, the CCW, ESW, and MDAFW pumps are shed from the safety busses and then loaded in sequence to the EDGs. The relay contacts' blocking/time delay

function ensure that no matter what the start demand is for the pumps, they are not started until the parallel contacts of the load sequencer close to start the pump at the required time increment.

Technical Specification 4.0.3 was entered at 1906 CDT on September 4, 1997, due to the discovery that the contacts had not been adequately tested in accordance with the technical specification surveillance requirements. Technical Specification 4.0.3 allows the ACTION requirements of the applicable sections to be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. However, Technical Specification 4.8.1.1.2.g requires that the surveillance testing be performed once every 18 months during shutdown. Thus, these surveillances cannot be performed at power under the current technical specification requirements.

Therefore, WCNOG requested Enforcement Discretion on September 5, 1997, to permit one-time testing of these contacts while the plant is at power. WCNOG also requested an additional 24 hours, beyond the 24 hours permitted by Technical Specification 4.0.3, to complete this testing. This request was verbally granted by the NRC on September 5, 1997 and followed with a letter dated September 12, 1997.

3.0 EVALUATION

The standby power supply for each safety-related load group consists of one diesel generator, complete with its accessories and fuel storage and transfer systems. The standby power supply is capable of supplying essential loads necessary to reliably and safely shut down and isolate the reactor. The diesel generator loads are determined on the basis of nameplate rating, pump pressure and flow conditions, or pump runout conditions. The continuous rating of the diesel generator is based on the maximum total load required at any time. The load shedding and emergency load sequencing (NF) system removes selected loads from the Class 1E busses under degraded bus voltage conditions, or upon the presence of a safety injection signal, and actuates equipment fed from these busses in a predetermined sequence following degraded bus voltage conditions or in the presence of a loss-of-coolant accident (LOCA).

The load shedding portion of the NF system removes selected loads under degraded voltage conditions on the 4160 volt Class 1E busses. Loads are then actuated in programmed intervals by the sequencing portion of the system such that the voltage of the busses does not fall below 75 percent of rated voltage and the frequency does not fall below 95 percent of rated frequency.

The contacts in question are actuated by relays K1102, K4102, K1117, K4117, K1118 and K4118. The relay contacts provide a blocking/time delay function for starting of the CCW, ESW, and MDAFW pumps. On a loss of offsite power, the CCW, ESW, and MDAFW pumps are shed from the safety busses and then loaded in sequence to the EDGs. These contacts ensure that no matter what the start demand is for the pumps, they are not started until the required time increment elapses. This prevents the simultaneous starting of pumps that

could lead to a degraded bus voltage condition, causing the sequence (shedding and reloading) to be repeated.

The integrated EDG and engineered safety features actuation test is performed during shutdown because of a potential that this surveillance could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and unit safety systems. The licensee has proposed to perform only a partial test of the subject load shedding and emergency load sequencing system relay contacts while at power. This test does not duplicate the integrated EDG and engineered safety features actuation test and will not cause any perturbation to the electrical distribution systems that could challenge steady state operation or unit safety systems.

For the relay contacts associated with the ESW and CCW pumps, the licensee has proposed to test the contacts by actuating slave relay K645A/B and verifying that the blocking contact on relays K1117, K4117, K1118 and K4118 change state. The licensee has stated that testing of these contacts at power will be performed in accordance with specific procedures approved for this purpose.

For the relay contacts associated with the MDAFW pumps, the licensee has proposed to test the contacts by isolating the relays (K1102, K4102) from their normal power supply by lifting leads, and actuating the relay using a portable power source to verify the contacts change state for the specified time period. During the test for the "A" MDAFW pump the leads from relay K1102 that shed NB0112, "NB01 Normal Feeder Breaker," must be lifted to preclude tripping this breaker. Improper conduct of the test could result in tripping NB0112, "NB01 Normal Feeder Breaker." However, any effects would be mitigated by implementation of existing plant off-normal procedures. The licensee has stated that this activity will be administratively controlled to ensure removal and restoration are safely accomplished.

During the testing the licensee has committed to the following compensatory actions:

1. WCNOG will follow its protected train philosophy and only one train will be worked on at a time.
2. No work will be ongoing in the switchyard; System Operations will be notified to maintain maximum grid stability.

Testing these relays at power will not cause any degradation in system performance, nor will it increase the number of challenges to equipment assumed to function during an accident situation. The testing will require related equipment to be declared inoperable for the duration of each test, but these durations will be much less than those allowed by the applicable technical specification action statements.

The additional 24 hours requested by the licensee to perform the testing of the contacts is necessary to allow sufficient time to prepare for and execute the testing. This additional time (48 hours total) is less than the allowed outage time for one EDG inoperable (72 hours).

Based on the above, the staff concludes that the one time testing of the blocking/time delay contacts associated with relays K1102, K4102, K1117, K4117, K1118, and K4118, at power, and the extension of the provisions of Technical Specification 4.0.3 to complete testing within 24 hours to 48 hours, to permit completion of the testing of these contacts by 1906 hours on September 6, 1997, is acceptable.

4.0 EXIGENT CIRCUMSTANCES

The Commission's regulations, 10 CFR 50.91, contain provisions for issuance of amendments when the usual 30-day public notice period cannot be met. One type of special exception is an exigency. An exigency is a case where prompt action is required (before the expiration of a 30-day comment period).

Under such circumstances, the Commission notifies the public in one of two ways: by issuing a Federal Register notice providing an opportunity for hearing and allowing at least two weeks for prior public comments, or by issuing a press release discussing the proposed changes, using the local media. In this case, the Commission used the first approach.

The exigent circumstances for this TS amendment request exist due to the recent discovery that certain contacts in the emergency diesel generator sequencer had not been monitored for proper operation during the required surveillance tests. The TS require the surveillance tests to be performed with the plant shut down and the additional 24 hours is needed to provide adequate time to perform the tests. This amendment will allow the testing of the contacts with the plant at power, thus avoiding a plant shutdown. Processing this TS amendment request on an exigent basis also ends the need for the Notice of Enforcement Discretion issued by the staff on September 12, 1997.

The NRC staff has reviewed the circumstances surrounding the amendment request and finds that the circumstances could not have been avoided and the licensee made a timely request for the amendment. Therefore, the staff finds that the license amendment may be issued in an exigent manner pursuant to 10 CFR 50.91(a)(6).

There were no public comments in response to the notice published in the Federal Register.

5.0 BASIS FOR 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 of consequences of an 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.

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

This proposed change does not change the function or performance requirements for the load shedding and emergency load sequencing system, as described in the Updated Safety Analysis Report (USAR) and the technical specifications. Testing these relays at power will not cause any degradation in system performance, nor will it increase the number of challenges to equipment assumed to function during an accident situation. The testing will require related equipment to be declared inoperable for the duration of each test, but these durations will be much less than those allowed by the applicable technical specification action statements. Further, the proposed change would prevent an unnecessary unit shutdown which could result in a reactor transient and a unwarranted challenge of the safety-related systems. This is a one-time test, and future testing will be performed in accordance with the requirements specified in the technical specifications.

Thus, the proposed change will not result in an increase in the consequences of, or an increase in the probability of occurrence of, any accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The load shedding and emergency load sequencing system will continue to perform in a manner consistent with the assumptions in the USAR. No new scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced. There will be no adverse effects or challenges imposed on any safety-related system as a result of this request. Therefore, the possibility of a new or different kind of accident is not created.

3. The proposed change does not involve a significant reduction in a margin of safety.

The purpose of this request is to allow WCNOG the ability to perform a one-time partial test of the subject load shedding and emergency load sequencing system relay contacts while at power. This testing will demonstrate complete compliance with Technical Specification 3/4.8.1 without having to shut down the unit. This activity will not affect any system or component setpoints or safety limit settings associated with the load shedding and emergency load sequencing system. No new accident scenarios, transient precursors, failure mechanisms, or limiting single

failures are introduced. There will be no significant adverse effects or challenges imposed on any safety-related system as a result of this request. This request will not result in a significant reduction in the margin of safety.

Based upon the above considerations, the staff concludes that the amendment meets the three criteria of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendment does not involve a significant hazards consideration.

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 surveillance requirement. 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 (62 FR 49261). 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: James Stone

Date: October 7, 1997