

August 12, 1999

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

SUBJECT: WOLF CREEK GENERATING STATION - ISSUANCE OF AMENDMENT RE:  
STEAM GENERATOR ATMOSPHERIC RELIEF VALVES (TAC NO. MA5713)

Dear Mr. Maynard:

The Commission has issued the enclosed Amendment No. 127 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 June 11, 1999.

The amendment revises TS 3.7.1.6, Steam Generator Atmospheric Relief Valves, and associated Bases to (1) require four atmospheric relief valves (ARVs) to be operable, (2) eliminate the use of "required" in the action statements, (3) provide action statements to address inoperability of two ARVs and three or more ARVs due to causes other than excessive leakage, and (4) limit the Limiting Condition for Operation 3.0.4 exception to one inoperable ARV.

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  
Jack N. Donohew, Senior Project Manager, Section 2  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosures: 1. Amendment No. 127 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 12, 1999

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President and Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
Post Office Box 411  
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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 black ink that reads "Jack N. Donohew".

Jack N. Donohew, Senior Project Manager, Section 2  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosures: 1. Amendment No. 127 to NPF-42  
2. Safety Evaluation

cc w/encls: See next page

Wolf Creek Generating Station

August 12, 1999

cc:

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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. 127  
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 June 11, 1999, 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. 127, 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 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Stephen Dembek, Chief, Section 2  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: August 12, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 127

FACILITY OPERATING LICENSE NO. NPF-42

DOCKET NO. 50-482

Revise the current Appendix A Technical Specifications (CTS), including the issued but not yet implemented Improved Technical Specifications (ITS), by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE

CTS 3/4 7-9a  
CTS B 3/4 7-3  
ITS 3.7-9  
ITS 3.7-10

INSERT

CTS 3/4 7-9a  
CTS B 3/4 7-3  
ITS 3.7-9  
ITS 3.7-10

## PLANT SYSTEMS

### MAIN STEAM LINE ISOLATION VALVES

#### LIMITING CONDITION FOR OPERATION

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3.7.1.5 Each main steam line isolation valve (MSLIV) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

MODE 1:

With one MSLIV inoperable but open, POWER OPERATION may continue provided the inoperable valve is restored to OPERABLE status within 4 hours; otherwise be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

MODES 2 and 3:

With one MSLIV inoperable, subsequent operation in MODE 2 or 3 may proceed provided the isolation valve is maintained closed. Otherwise, be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

#### SURVEILLANCE REQUIREMENTS

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4.7.1.5 Each MSLIV shall be demonstrated OPERABLE by verifying full closure within 5 seconds when tested pursuant to Specification 4.0.5. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3.

PLANT SYSTEMS

STEAM GENERATOR ATMOSPHERIC RELIEF VALVES

LIMITING CONDITION FOR OPERATION

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3.7.1.6 At least four steam generator atmospheric relief valves (ARV's) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With one of the ARV's inoperable due to causes other than excessive seat leakage, within 7 days restore the ARV to OPERABLE status, or be in HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With two ARV's inoperable due to causes other than excessive seat leakage, restore all but one ARV to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. With three or more ARV's inoperable due to causes other than excessive seat leakage, restore all but two ARV's to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- d. With one or more ARV's inoperable because of excessive seat leakage, close the associated block valve(s) within 1 hour and restore the ARV to OPERABLE within 30 days, or be in HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

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4.7.1.6 No additional requirements other than those required by Specification 4.0.5.

## PLANT SYSTEMS

### BASES

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#### 3/4.7.1.5 MAIN STEAM LINE ISOLATION VALVES

The OPERABILITY of the main steam line isolation valves ensures that no more than one steam generator will blowdown in the event of a steam line rupture. This restriction is required to: (1) minimize the positive reactivity effects of the Reactor Coolant System cooldown associated with the blowdown, and (2) limit the pressure rise within containment in the event the steam line rupture occurs within containment. The OPERABILITY of the main steam isolation valves within the closure times of the Surveillance Requirements are consistent with the assumptions used in the safety analyses.

#### 3.4.7.1.6 STEAM GENERATOR ATMOSPHERIC RELIEF VALVES

The operability of the main steamline atmospheric relief valves (ARV's) ensures that reactor decay heat can be dissipated to the atmosphere in the event of a steam generator tube rupture and loss of offsite power and that the Reactor Coolant System can be cooled down for Residual Heat Removal System operation. The number of ARV's assures that the subcooling can be achieved, consistent with the assumptions used in the steam generator tube rupture analysis, to facilitate equalizing pressures between the Reactor Coolant System and the ruptured steam generator and that RCS cooldown to RHR entry conditions following SG overfill can be completed in a timely manner. In the event of a SGTR, at least two intact steam generator ARV's are required for RCS cooldown. In this case, with four ARV's OPERABLE, if the single failure of one ARV occurs and another ARV is assumed to be associated with the ruptured steam generator, two intact steam generator ARV's remain available for required RCS cooldown.

Each ARV is equipped with a manual block valve (in the auxiliary building) to provide a positive shutoff capability should an ARV develop leakage or fail to reseat following opening. Closure of the block valves of all ARV's because of excessive seat leakage does not endanger the reactor core; consistent with plant accident and transient analyses, decay heat can be dissipated with the main steamline safety valves or a block valve can be opened manually in the auxiliary building and the ARV can be used to control release of steam to the atmosphere.

#### 3/4.7.1.7 MAIN FEEDWATER ISOLATION VALVES

The OPERABILITY of the main feedwater isolation valves: (1) provides a pressure boundary to permit auxiliary feedwater addition in the event of a main steam or feedwater line break; (2) limits the RCS cooldown and mass and energy releases for secondary line breaks inside containment; and (3) mitigates steam generator overfill events such as a feedwater malfunction with protection provided by feedwater isolation via the steam generator high-high level trip signal. The OPERABILITY of the main feedwater isolation valves within the closure times of the surveillance requirements is consistent with the assumptions used in the safety analysis.

#### 3/4.7.2 DELETED

## PLANT SYSTEMS

### BASES

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#### 3/4.7.3 COMPONENT COOLING WATER SYSTEM

The OPERABILITY of the Component Cooling Water System ensures that sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions. The redundant cooling capacity of this system, assuming a single failure, is consistent with the assumptions used in the safety analyses. Each independent CCW loop contains two 100% capacity pumps and, therefore, the failure of one pump does not affect the OPERABILITY of that loop. Surveillance Requirement 4.7.3b. verifies proper operation of the CCW valves and pumps on an actuation signal. The CCW System is a normally operating system that cannot be fully actuated as part of routine testing during normal operation. The 18 month Frequency is based on the need to perform this surveillance under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power.

#### 3/4.7.4 ESSENTIAL SERVICE WATER SYSTEM

The OPERABILITY of the Essential Service Water System ensures that sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions. The redundant cooling capacity of this system, assuming a single failure, is consistent with the assumptions used in the safety analysis.

#### 3/4.7.5 ULTIMATE HEAT SINK

The limitations on the ultimate heat sink level and temperature ensure that sufficient cooling capacity is available either to: (1) provide normal cooldown of the facility or (2) mitigate the effects of accident conditions within acceptable limits.

The limitations on minimum water level and maximum temperature are based on providing a 30-day cooling water supply from the Essential Service Water pumps to safety-related equipment without exceeding its design basis temperature and is consistent with the recommendations of Regulatory Guide 1.27, "Ultimate Heat Sink for Nuclear Plants," March 1974.

#### 3/4.7.6 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

The OPERABILITY of the Control Room Emergency Ventilation System ensures that: (1) the ambient air temperature does not exceed the allowable temperature for continuous-duty rating for the equipment and instrumentation cooled by this system, and (2) the control room will remain habitable for operations personnel during and following all credible accident conditions. Operation of the system with the heaters operating to maintain low humidity using automatic control for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the charcoal adsorbers and HEPA filters. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rems or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criterion 19 of Appendix A, 10 CFR Part 50. ANSI N510-1975 and N510-1980 will be used as procedural guides for surveillance testing. Surveillance testing provides assurance that system and component performances continue to be in accordance with performance specifications for Wolf Creek Unit 1, including applicable parts of ANSI N509-1976.

3.7 PLANT SYSTEMS

3.7.4 Atmospheric Relief Valves (ARVs)

LCO 3.7.4 Four ARV lines shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One ARV line inoperable for reasons other than excessive leakage.</p>	<p>A.1</p> <p>-----NOTE----- LCO 3.0.4 is not applicable. -----</p> <p>Restore required ARV line to OPERABLE status.</p>	<p>7 days</p>
<p>B. Two ARV lines inoperable for reasons other than excessive leakage.</p>	<p>B.1</p> <p>Restore all but one required ARV line to OPERABLE status.</p>	<p>72 hours</p>
<p>C. Three or more ARV lines inoperable for reasons other than excessive leakage.</p>	<p>C.1</p> <p>Restore all but two ARV lines to OPERABLE status.</p>	<p>24 hours</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME	
<p>D. With one or more of the ARVs inoperable because of excessive seat leakage.</p>	<p>-----NOTE----- LCO 3.0.4 is not applicable. -----</p>		
	<p>D.1 Initiate action to close the associated block valve(s).</p>		<p>Immediately</p>
	<p><u>AND</u> D.2 Restore ARV(s) to OPERABLE status.</p>		<p>30 days</p>
<p>E. Required Action and associated Completion Time not met.</p>	<p>E.1 Be in MODE 3.</p>	<p>6 hours</p>	
	<p><u>AND</u></p>		
	<p>E.2 Be in MODE 4.</p>	<p>12 hours</p>	

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.4.1 Verify one complete cycle of each ARV.</p>	<p>In accordance with the Inservice Testing Program</p>
<p>SR 3.7.4.2 Verify one complete cycle of each ARV block valve.</p>	<p>18 months</p>



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 127 TO FACILITY OPERATING LICENSE NO. NPF-42

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

1.0 INTRODUCTION

By application dated June 11, 1999, Wolf Creek Nuclear Operating Corporation (the licensee) requested changes to the Technical Specifications (TSs, Appendix A to Facility Operating License No. NPF-42) for the Wolf Creek Generating Station (WCGS). The proposed changes would revise TS 3.7.1.6, Steam Generator Atmospheric Review Valves, and associated Bases to (1) require four atmospheric relief valves (ARVs) to be operable, (2) eliminate the use of "required" in the action statements, (3) provide action statements to address inoperability of two ARVs and three or more ARVs due to causes other than excessive leakage, and (4) limit the Limiting Condition for Operation (LCO) 3.0.4 exception to one inoperable ARV.

The licensee requested amendments be made to the current TSs and to the improved TSs for WCGS. The improved TSs were approved in Amendment No. 123, that was issued March 31, 1999, but not yet implemented. The improved TSs will be implemented by December 31, 1999.

2.0 BACKGROUND

The WCGS main steam supply system includes four ARVs, with one ARV installed on each of the four main steam lines. Each ARV is provided with an upstream manual isolation valve for positive shutoff capability should the ARV fail in the open position.

The ARVs, in conjunction with auxiliary feedwater system (AFW), provide a method for cooling the plant such that the residual heat removal system (RHR) can be placed into service to complete a plant cooldown. The ARVs also assure that subcooling can be achieved to facilitate equalizing the pressure between the reactor coolant system (RCS) and the ruptured steam generator following a postulated steam generator tube rupture (SGTR) event, and that cooldown of the RCS to RHR entry conditions can be accomplished in a timely manner.

The ARVs and associated manual isolation valves are credited in the WCGS licensing basis for a postulated SGTR and loss of offsite power (LOOP) event. During a postulated SGTR/LOOP event, the ARVs on two intact steam generators are assumed to operate to cooldown and depressurize the RCS. The WCGS Final Safety Analysis Report (FSAR) also assumes a single ARV on the ruptured steam generator fails in the open position. The associated manual

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isolation valve is credited to be closed to isolate the failed open ARV on the ruptured steam generator within a specified period assumed in the accident analysis.

WCGS TS 3.7.1.6 provides operability and surveillance requirements for the ARVs. TS 3.7.1.6 requires three ARVs to be operable. In reviewing the SGTR evaluation, the licensee identified that the WCGS licensing basis is more restrictive than TS 3.7.1.6 in that it requires four ARVs to be operable during a postulated SGTR event. Therefore, the licensee proposed changes to TS 3.7.1.6 to require four ARVs to be operable.

The proposed changes to require four ARVs to be maintained operable will make the WCGS TS 3.7.1.6 consistent with the WCGS licensing basis. The licensee also proposed changes to revise and incorporate action statements for multiple inoperable ARVs and to clarify TS 3.0.4 applicability. Each proposed change is described and evaluated below.

### 3.0 EVALUATION

The licensee proposed the following changes to TS 3.7.1.6 of the current TSs and TS 3.7.4 of the improved TSs:

- Revise LCO to require four, rather than three ARVs to be operable.
- Provide actions statements to address inoperability of two ARVs and three or more ARVs, respectively, due to causes other than excessive seat leakage.
- Eliminate the use of the word "required" in the actions statements to be consistent with NUMARC 93-03, "Writer's Guide for the Restructured Technical Specifications."
- Limit the LCO 3.0.4 exception to one inoperable ARV.

#### 3.1 Four ARVs

The licensee performed an evaluation of the number of operable ARVs required during the design basis SGTR accident, as well as the number required for other scenarios. The licensee's review determined that four operable ARVs are required during a postulated SGTR event. Specifically, with four operable ARVs, if the single active failure is assumed on an ARV for an intact steam generator, and the ARV associated with the ruptured steam generator is unavailable, then the two remaining ARVs would be required to ensure a rapid RCS cooldown. The evaluation concluded that the FSAR scenario represents the limiting case with respect to maximizing the offsite dose consequences of the SGTR event. An evaluation of SGTR scenarios with respect to steam generator overfill concluded that overfill would not occur and there exists a margin to steam generator overfill.

The safety analysis is based on the requirement that four steam generator ARVs be operable. Since the proposed change would revise the TSs to require four ARVs, rather than the current three, to be operable, and this is a more restrictive change, consistent with the licensing basis, the proposed change is acceptable.

### 3.2 Two ARVs and Three or More ARVs Inoperable

The licensee proposed to revise the TSs to address two inoperable ARVs due to causes other than excessive ARV seat leakage. With two ARVs inoperable, the AOT for restoration of all but one ARV to operable status is changed from 24 hours to 72 hours. The existing TS allows one valve to be inoperable indefinitely and with one required ARV inoperable; the AOT for restoration is seven days. By modifying the LCO to require four ARVs to be operable, an AOT of 72 hours is more restrictive than the existing TS. Therefore, revising the AOT from 24 hours to 72 hours is acceptable based on a more restrictive AOT from the existing TS and the low probability of an event requiring decay heat removal occurring during the restoration period that would require the ARVs.

The licensee also proposed to revise the TSs to address inoperability of three or more ARVs, due to causes other than excessive ARV seat leakage. With three or more ARVs inoperable due to causes other than excessive ARV seat leakage, the AOT for restoration of all but two required ARVs would remain 24 hours, consistent with the current action statement requirements. NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, permits two or more ARVs to be inoperable with a required action of returning all but one to operable status within 24 hours. Since the AOT provided in the TSs is consistent with NUREG-1431, Revision 1, this change is acceptable.

### 3.3 Elimination of the Word "required"

The licensee proposed to revise TS 3.7.1.6 to eliminate the use of the word "required" to be consistent with Section 4.1.6 of NUMARC 93-03, which states "Occasionally an LCO requires operability of only some of the components of a particular function which could be used to satisfy the requirements (i.e., two offsite circuits when three are installed and available). In this event, the Conditions, Required Actions and Surveillances which refer to the item(s) required by the LCO are preceded by "required." Since the LCO is revised to require four ARVs to be operable, and the design of the system only provides four ARVs, the use of "required" is unnecessary. Therefore, the change is acceptable.

### 3.4 LCO 3.0.4 - Clarification of Exception

The licensee proposed to revise the TSs to limit the exception to Specification 3.0.4 to the new TS 3.7.1.6.a and 3.7.1.6.d. This change is more restrictive than current TS requirements in that the exception would only allow entry into an operational mode or other specified condition when only one ARV is inoperable due to causes other than excessive seat leakage. This change is consistent with NUREG-1431, Revision 1, and is acceptable.

### 3.5 Bases to Technical Specifications

The licensee also submitted changes to the Bases for the current and improved TSs. The Bases changes are correct.

#### 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 (64 FR 35215). 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: K. Thomas

Date: August 12, 1999