

March 24, 1999

Mr. Otto L. Maynard  
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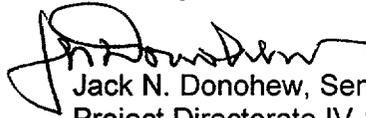
SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT  
FOR THE PROPOSED CONVERSION TO THE IMPROVED STANDARD  
TECHNICAL SPECIFICATIONS FOR WOLF CREEK NUCLEAR GENERATING  
STATION (TAC NO. M98738)

Dear Mr. Maynard:

Enclosed is a copy of the Environmental Assessment and Finding of No Significant Impact related to your application of May 15, 1997 (ET 97-0050), as supplemented by (1) the letters in 1998 dated June 30 (ET 98-0049), August 5 (WO 98-0078), August 28 (ET 98-0071), September 24 (ET 98-0078), October 16 (ET 98-0085), October 23 (ET 98-0087), November 24 (WO 98-0105), December 2 (ET 98-0098), December 17 (ET 98-0102), and December 21 (ET 98-0107), and (2) the letters in 1999 dated February 4 (ET 99-0004) and March 5 (ET 99-0009, ET 99-0010, and ET 99-0011) on your proposed conversion of the current Technical Specifications (CTS) for the Wolf Creek Nuclear Generating Station (WCNGS) to the Improved Technical Specifications (ITS). The ITS are based on the CTS, NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 1, dated April 1995, and guidance provided in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132).

The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,



Jack N. Donohew, Senior Project Manager  
Project Directorate IV-1  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosure: Environmental Assessment

cc w/encl: See next page

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March 24, 1999

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UNITED STATES NUCLEAR REGULATORY COMMISSIONWOLF CREEK NUCLEAR OPERATING CORPORATIONDOCKET NO. 50-482WOLF CREEK GENERATING STATIONENVIRONMENTAL ASSESSMENT AND FINDING OFNO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering the issuance of an amendment to Facility Operating License No. NPF-42 that was issued to Wolf Creek Nuclear Operating Corporation (the licensee) for operation of the Wolf Creek Generating Station (WCGS), located in Coffey County, Kansas.

ENVIRONMENTAL ASSESSMENTIdentification of the Proposed Action:

The proposed amendment will revise the current Technical Specifications (CTS) for WCGS in their entirety based on the guidance provided in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 1, dated April 1995, and in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132). The proposed action is in accordance with the licensee's amendment request dated May 15, 1997, as supplemented by (1) the letters in 1998 dated June 30, August 5, August 28, September 24, October 16, October 23, November 24, December 2, December 17, and December 21, and (2) the letters in 1999 dated February 4 and March 5 (3 letters).

The Need for the Proposed Action:

It has been recognized that nuclear safety in all nuclear power plants would benefit from an improvement and standardization of plant Technical Specifications (TS). The NRC's "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Plants," (52 FR 3788) contained proposed criteria for defining the scope of TS. Later, the NRC's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132), incorporated lessons learned since publication of the interim policy statement and formed the basis for revisions to 10 CFR 50.36, "Technical Specifications." The "Final Rule" (60 FR 36953) codified criteria for determining the content of TS. To facilitate the development of standard TS for nuclear power reactors, each power reactor vendor owners' group (OG) and the NRC staff developed standard TS. For WCGS, the Improved Standard Technical Specifications (ISTS) are in NUREG-1431. This document formed the basis for the WCGS Improved Technical Specifications (ITS) conversion. The NRC Committee to Review Generic Requirements (CRGR) reviewed the ISTS, made note of its safety merits, and indicated its support of the conversion by operating plants to the ISTS.

Description of the Proposed Change

The proposed changes to the CTS are based on NUREG-1431 and on guidance provided by the Commission in its Final Policy Statement. The objective of the changes is to completely rewrite, reformat, and streamline the CTS (i.e., to convert the CTS to the ITS). Emphasis is placed on human factors principles to improve clarity and understanding of the TS. The Bases section of the ITS has been significantly expanded to clarify and better explain the purpose and foundation of each specification. In addition to NUREG-1431, portions of the CTS were also used as the basis for the development of the WCGS ITS. Plant-specific issues (e.g., unique

design features, requirements, and operating practices) were discussed with the licensee, and generic matters with Westinghouse and other OGs.

This conversion is a joint effort in concert with three other utilities: Pacific Gas & Electric Company for Diablo Canyon Power Plant, Units 1 and 2 (Docket Nos. 50-275 and 50-323); TU Electric for Comanche Peak Steam Electric Station, Units 1 and 2 (Docket Nos. 50-445 and 50-446); and Union Electric Company for Callaway Plant, Unit 1 (Docket No. 50-483). It was a goal of the four utilities to make the ITS for all the plants as similar as possible. This joint effort includes a common methodology for the licensees in marking-up the CTS and NUREG-1431 specifications, and the NUREG-1431 Bases, that has been accepted by the staff.

This common methodology is discussed at the end of Enclosure 2, "Mark-Up of Current TS"; Enclosure 5a, "Mark-Up of NUREG-1431 Specifications"; and Enclosure 5b, "Mark-Up of NUREG-1431 Bases, for each of the 14 separate ITS sections that were submitted with the licensee's application. Each of the 14 ITS sections also includes the following enclosures:

- Enclosure 1, "Cross-Reference Table," provides the cross-reference table connecting each CTS specification (i.e., limiting condition for operation, required action, or surveillance requirement) to the associated ITS specification, sorted by both CTS and ITS specifications.
- Enclosures 3A and 3B, "Description of Changes to Current TS" and "Conversion Comparison Table," provides the description of the changes to the CTS section and the comparison table showing which plants (of the four licensees in the joint effort) that each change applies.
- Enclosure 4, "No Significant Hazards Considerations," provides the no significant hazards consideration (NSHC) of 10 CFR 50.91 for the changes to the CTS. A description of the NSHC organization is provided, followed by generic NSHCs for administrative, more

restrictive, relocation, and moving-out-of-CTS changes, and individual NHSCs for less restrictive changes.

- Enclosures 6A and 6B, "Differences From NUREG-1431" and "Conversion Comparison Table," provides the descriptions of the differences from NUREG-1431 specifications and the comparison table showing which plants (of the four licensees in the joint effort) that each difference applies.

The common methodology includes the convention that, if the words in a CTS specification are not the same as the words in the ITS specification, but the CTS words have the same meaning or have the same requirements as the words in the ITS specification, then the licensees do not have to indicate or describe a change to the CTS. In general, only technical changes have been identified; however, some non-technical changes have also been identified. The portion of any specification which is being deleted is struck through (i.e., the deletion is annotated using the strike-out feature of the word processing computer program or crossed out by hand). Any text being added to a specification is shown by shading the text, placing a circle around the new text, or by writing the text in by hand. The text being struck through or added is shown in the marked-up CTS and ISTS pages in Enclosures 2 (CTS pages) and 5 (ISTS and ISTS Bases pages) for each ITS section attachment to the application. Another convention of the common methodology is that the technical justifications for the less restrictive changes are in the NHSCs.

The proposed changes can be grouped into the following four categories: relocated requirements, administrative changes, less restrictive changes involving deletion of requirements, and more restrictive changes. These categories are as follows:

1. Relocated requirements (i.e., the licensee's "LG" or "R" changes) are items which are in the CTS but do not meet the criteria set forth in the Final Policy Statement. The Final Policy

Statement establishes a specific set of objective criteria for determining which regulatory requirements and operating restrictions should be included in the TS. Relocation of requirements to documents with an established control program, controlled by the regulations or the TS, allows the TS to be reserved only for those conditions or limitations upon reactor operation which are necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, thereby focusing the scope of the TS. In general, the proposed relocation of items from the CTS to the Updated Safety Analysis Report (USAR), appropriate plant-specific programs, station procedures, or ITS Bases follows the guidance of NUREG-1431. Once these items have been relocated to other licensee-controlled documents, the licensee may revise them under the provisions of 10 CFR 50.59 or other NRC-approved control mechanisms, which provide appropriate procedural means to control changes by the licensee.

2. Administrative changes (i.e., the licensee's "A" changes) involve the reformatting and rewording of requirements, consistent with the style of the ISTS in NUREG-1431, to make the TS more readily understandable to station operators and other users. These changes are purely editorial in nature, or involve the movement or reformatting of requirements without affecting the technical content. Application of a standardized format and style will also help ensure consistency is achieved among specifications in the TS. During this reformatting and rewording process, no technical changes (either actual or interpretational) to the TS will be made unless they are identified and justified.

3. Less restrictive changes and the deletion of requirements involves portions of the CTS (i.e., the licensee's "LS" and "TR" changes) which (1) provide information that is descriptive in nature regarding the equipment, systems, actions, or surveillances, (2) provide little or no safety benefit, and (3) place an unnecessary burden on the licensee. This information is proposed to

be deleted from the CTS and, in some instances, moved to the proposed Bases, USAR, or procedures. The removal of descriptive information to the Bases of the TS, USAR, or procedures is permissible because these documents will be controlled through a process that utilizes 10 CFR 50.59 and other NRC-approved control mechanisms. The relaxations of requirements were the result of generic NRC actions or other analyses. They will be justified on a case-by-case basis for the WCGS and described in the safety evaluation to be issued with the license amendment.

4. More restrictive requirements (i.e., the licensee's "M" changes) are proposed to be implemented in some areas to impose more stringent requirements than are in the CTS. In some cases, these more restrictive requirements are being imposed to be consistent with the ISTS. Such changes have been made after ensuring the previously evaluated safety analysis for the WCGS was not affected. Also, other more restrictive technical changes have been made to achieve consistency, correct discrepancies, and remove ambiguities from the TS. Examples of more restrictive requirements include: placing a Limiting Condition for Operation (LCO) on station equipment which is not required by the CTS to be operable; more restrictive requirements to restore inoperable equipment; and more restrictive surveillance requirements.

There are twenty-two other proposed changes to the CTS that may be included in the proposed amendment to convert the CTS to the ITS. These are beyond scope issues (BSIs) in that they are changes to both the CTS and the ISTS. For the WCNGS, these are the following:

1. Change 1-05-M (CTS Section 3/4.4). The change would add a note under CTS 3.4.1.2 (ITS 3.4.5) to establish secondary side temperature restrictions on starting an idle reactor coolant pump when below the low temperature overpressurization arming temperature of 368 degrees F. The change would also add similar notes to CTS 3.4.1.3 and 3.4.1.4.1 (ITS 3.4.6 and 3.4.7). The notes would help ensure the

assumptions in the WCNGS low temperature overpressurization event analysis remain valid.

2. Change 1-15-M (CTS Section 3/4.4). CTS Surveillance Requirements (SRs) 4.4.1.2.2 and 4.4.1.3.2 require steam generator (SG) levels to be periodically verified to be greater than or equal to 10 percent wide range water level. The proposed change would revise the SG level value to 6 percent narrow range water level. This change would help ensure that the SG level is sufficient to cover all SG tubes so that the SGs would provide an adequate heat sink for removal for decay heat. The proposed change would similarly revise CTS 3.4.1.4.b, which currently requires, for operational Mode 5, that the SG level be maintained greater than 10 percent wide range level. The change would increase this level value to greater than 66 percent wide range, which again would help ensure the SG tubes remain covered in Mode 5.
3. Change 7-10-LS-9, (CTS Section 3/4.6). The proposed change would add a note to CTS SRs 4.6.1.7.2 and 4.6.1.7.4 stating that containment purge valves with resilient seals are not required to be leak rate tested when the penetration flow path is isolated by leak-tested blank flange.
4. Change 2-20-A (2-20-A has two changes associated with it. This is the first of two.) (CTS Section 3/4.8). The proposed change would increase the minimum battery cell float voltages for DC sources in CTS Table 4.8-2 by 0.01 to 0.02 volts.
5. Change 2-20-A (Second change associated with 2-20-A) (CTS Section 3/4.8). A change would be made to decrease the total required battery terminal voltage for a DC subsystem in CTS SR 4.8.2.1. These proposed changes in minimum cell float voltage and corresponding total required battery voltage would reflect a recent

design modification made by the licensee that replaced the Gould manufactured square cell batteries with AT&T manufactured round cell batteries.

6. Change 2-27-M (CTS Section 3/4.8). The proposed change would revise the battery performance discharge test acceptance criteria in CTS 4.8.2.1.e to reflect a recent design modification that replaced the Gould manufactured square cell batteries with AT&T manufactured round cell batteries.

The above six BSIs are given in the licensee's application. The remaining sixteen BSIs may have been revised by the licensee's responses to the NRC requests for additional information (RAIs). The format for the sixteen BSIs listed below is the associated change number, RAI number, RAI response submittal date, and description of the change.

7. Change 1-22-M (CTS Section 3/4.3), question Q3.3-49, response letter dated November 24, 1998. The proposed change would add quarterly channel operational tests (COTs) to CTS Table 4.3-1 for the power range neutron flux-low, intermediate range neutron flux, and source range flux trip functions. The CTS only require a COT prior to startup for these functions. A new note (Note 19) would be added to require that the new quarterly COT be performed within 12 hours after reducing power below P-10 for the power range and intermediate range instrumentation if not performed within the previous 92 days (P-10 is the dividing point marking the applicability for these trip functions). A new note (Note 20) would also be added requiring the P-6 and P-10 interlocks be verified to be in their required state during all COTs on the power range neutron flux-low and intermediate range neutron flux trip functions.
8. Change 1-7-LS-3 (CTS Section 3/4.3), question Q3.3-107, response letter dated December 2, 1998. The proposed changes would (1) extend the completion time

for CTS Action 3.b from no time specified to 24 hours for intermediate range channel restoration or changing the power level to either below P-6 or above P-10, (2) reduce the applicability of the intermediate range neutron flux channels and delete CTS Action 3.a as being outside the revised applicability, and (3) add a less restrictive new action that requires immediate suspension of operations involving positive reactivity additions and a power reduction below P-6 within 2 hours, but no longer requires a reduction to Mode 3.

9. Change 1-9-A (CTS Section 6.0), question Q5.2-1, response letter dated September 24, 1998. The proposed change would revise requirements concerning overtime control by replacing CTS 6.2.2.e with a reference to administrative procedures for the control of working hours.
10. Change 1-15-A (CTS Section 6.0), question Q5.2-1, response letter dated September 24, 1998. The proposed change would revise CTS 6.2.2.G to eliminate the title of Shift Technical Advisor. The engineering expertise is maintained on shift, but a separate individual would not be required as allowed by a Commission Policy Statement.
11. Change 2-18-A (CTS Section 6.0), question Q5.2-1, response letter dated September 24, 1998. The proposed change would revise the dose rate limits in the Radioactive Effluent Controls Program for releases to areas beyond the site boundary would be revised to reflect 10 CFR Part 20 requirements.
12. Change 2-22-A (CTS Section 6.0), question Q5.2-1, response letter dated September 24, 1998. The proposed change would revise the Radioactive Effluent Controls Program to include clarification statements denoting that the provisions of

CTS 4.0.2 and 4.0.3, which allow extensions to surveillance frequencies, are applicable to these activities.

13. Change 3-11-A (CTS Section 6.0), question Q5.2-1, response letter dated September 24, 1998. CTS provides alternative high radiation area access control alternatives pursuant to 10 CFR 20.203(c)(2). The proposed change would revise CTS 6.12 to meet the current requirements in 10 CFR Part 20 and the guidance in NRC Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants" for such access controls.
14. Change 3-18-LS-5 (CTS Section 6.0), question Q5.2-1, response letter dated September 24, 1998. The proposed change would delete the CTS 6.9.1.8 requirement to provide documentation of all challenges to the power operated relief valves (PORVs) and safety valves on the reactor coolant system. This proposed change is based on Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," which reduced the requirements for submitting such information to the NRC. GL 97-02 did not include these valves for information to be submitted.
15. Change 9-17-LS-24 (CTS Section 3/4.4), question Q3.4.12-5, response letter dated September 24, 1998. The proposed change would add four notes to CTS 3.4.9.3 to reflect CTS SR 4.5.3.2, LCO 3.5.4 actions, LCO 3.5.4 applicability notes and the accumulator action proposed under Change 9-10-M for CTS 3/4.4. Note 1 on centrifugal charging pump (CCP) swap operations would be a relaxation of the CTS because it would allow both CCPs to be capable of injecting into the RCS for up to 4 hours throughout low temperature protection applicability.
16. Change 10-20-LS-39 (CTS Section 3/4.7), question Q3.7.10-14, response letter dated October 16, 1998. The proposed change would revise and add an action to

CTS LCOs 3.7.6 and 3.7.7 for ventilation system pressure envelope degradation that allows 24 hours to restore the control room pressure envelope through repairs before requiring the unit to perform an orderly shutdown. The new action has a longer allowed outage time than LCO 3.0.4 which the CTS would require to be entered immediately. The new action has a longer allowed outage time than LCO 3.0.4 which the CTS would require to be entered immediately. This change recognizes that the ventilation trains associated with the pressure envelope would still be operable.

17. Change 4-8-LS-34 (CTS Section 3/4.4), question Q3.4.11-2, response letter dated September 24, 1998. The proposed change would limit the CTS SRs 4.4.4.1 and 4.4.4.2 requirements to perform the 92-day surveillance of the pressurizer PORV block valves and the 18-month surveillance of the pressurizer PORVs (i.e., perform one complete cycle of each valve) to only Modes 1 and 2.
18. Change 4-9-LS-36 (CTS Section 3/4.4), question Q3.4.11-4, response letter dated September 24, 1998. The proposed change would add a note to CTS LCO 3.4.4 Action (d) that would state that the action does not apply when the PORV block valves are inoperable as a result of power being removed from the valves in accordance with Actions (b) and (c) for an inoperable PORV.
19. Change 1-60-A (CTS Section 3/4.3), question TR3.3-0073.3, response letter dated December 21, 1998. The proposed change would revise the frequency for conducting the trip actuating device operational test (TADOT) for the turbine trip of the reactor trip instrumentation surveillance requirements in CTS Table 4.3-1 from "prior to reactor startup" to "prior to exceeding the P-9 interlock whenever the unit has been in Mode 3."

20. Change 1-70-M (CTS Section 3/4.8), question Q3.8.2-04, response letter dated December 17, 1998. The proposed change would add shutdown requirements (including actions) for the load shedder and emergency load sequencer (LSELS) to CTS LCO 3.8.1.2 and surveillance requirements in SR 4.8.1.2. These requirements would reflect current practice.
21. Change 2-25-LS-23 (CTS Section 3/4.8), question Q3.8.4-08, response letter dated December 17, 1998. The proposed change would allow substitution of the service test with a performance discharge test in CTS 4.8.2.1.
22. Change 14-9-M (CTS Section 3/4.7), question Q3.7.16-3, response letter dated February 4, 1999. The proposed change would provide a new LCO, Actions and SRs based on the ISTS to impose limitations on the boron concentration in the fuel storage pool. The BSI for the conversion to ITS is that a minimum value for boron concentration would be added that is currently not in the CTS, and the Actions would be revised to reflect additional regions of fuel storage based on approval of reracking the spent fuel pool prior to issuance of the ITS.

Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed conversion of the CTS to the ITS for WCGS, including the beyond scope issues discussed above. Changes which are administrative in nature have been found to have no effect on the technical content of the TS. The increased clarity and understanding these changes bring to the TS are expected to improve the operators' control of WCGS in normal and accident conditions.

Relocation of requirements from the CTS to other licensee-controlled documents does not change the requirements themselves. Future changes to these requirements may then be made by the licensee under 10 CFR 50.59 and other NRC-approved control mechanisms which

will ensure continued maintenance of adequate requirements. All such relocations have been found consistent with the guidelines of NUREG-1431 and the Commission's Final Policy Statement.

Changes involving more restrictive requirements have been found to enhance station safety.

Changes involving less restrictive requirements have been reviewed individually. When requirements have been shown to provide little or no safety benefit, or to place an unnecessary burden on the licensee, their removal from the TS was justified. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of a generic action, or of agreements reached during discussions with the OG, and found to be acceptable for WCGS. Generic relaxations contained in NUREG-1431 have been reviewed by the NRC staff and found to be acceptable.

In summary, the proposed revisions to the TS were found to provide control of station operations such that reasonable assurance will be provided that the health and safety of the public will be adequately protected.

The proposed action will not increase the probability or consequences of accidents, will not change the quantity or types of any effluent that may be released offsite, and will not significantly increase the occupational or public exposure. Also, these changes do not increase the licensed power and allowable effluents for the station. The changes will not create any new or unreviewed environmental impacts that were not considered in the Final Environmental Statement related to the operation of WCNGS, NUREG-0878, dated June 1982. Therefore, there are no significant radiological impacts associated with the proposed action.

With regard to potential non-radiological impacts, the proposed action only involves features located entirely within the restricted area for the station defined in 10 CFR Part 20 and

does not involve any historic sites. The proposed action does not affect non-radiological station effluents and has no other environmental impact. It does not increase any discharge limit for the station. Therefore, there are no significant non-radiological environmental impacts associated with the proposed action.

Accordingly, the Commission concludes that there are no significant environmental impacts associated with the proposed action.

Alternatives to the Proposed Action:

As an alternative to the proposed action, the staff considered denial of the proposed action (i.e., the "no-action" alternative). Denial of the licensee's application would result in no change in current environment impacts. The environmental impacts of the proposed action and the alternative action are similar.

Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the Final Environmental Statement for the Wolf Creek Generating Station dated June 1982.

Agencies and Persons Consulted:

In accordance with its stated policy, on March 22, 1999, the staff consulted with the Kansas State official, Mr. Vick Cooper, Kansas Department of Health and Environment, regarding the environmental impact of the proposed action. The State official had no comments.

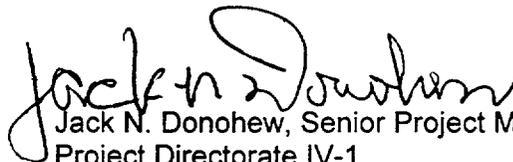
FINDING OF NO SIGNIFICANT IMPACT

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's application dated May 15, 1997, as supplemented by (1) the letters in 1998 dated June 30, August 5, August 28, September 24, October 16, October 23, November 24, December 2, December 17, and December 21, and (2) the letters in 1999 dated February 4 and March 5 (3 letters) which are available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document rooms located at the Emporia State University, William Allen White Library, 1200 Commercial Street, Emporia, Kansas 66801 and Washburn University School of Law Library, Topeka, Kansas 66621.

Dated at Rockville, Maryland, this 24th day of March 1999.

FOR THE NUCLEAR REGULATORY COMMISSION

  
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Office of Nuclear Reactor Regulation