

# **WOLF CREEK**

NUCLEAR OPERATING CORPORATION

Britt T. McKinney  
Vice President Operations

**JUL 25 2002**

WO 02-0031

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Subject: Docket No. 50-482: Revision to Technical Specification Chapter 5.0,  
"Administrative Controls"

Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOC) herewith transmits an application for amendment to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS). This amendment application would revise Technical Specification Chapter 5.0, "Administrative Controls," to allow the use of generic personnel titles as provided by ANSI/ANS-3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," in lieu of plant specific personnel titles. The proposed changes are consistent with industry technical specification task force (TSTF) traveler TSTF-065, Revision 1.

The WCNOC Plant Safety Review Committee and the Nuclear Safety Review Committee have reviewed this amendment application. Attachments I through V provide the required Affidavit, Evaluation, Markup of Technical Specifications, Retyped Technical Specifications, and List of Commitments, respectively, in support of this amendment request.

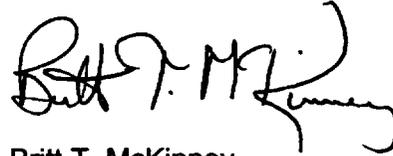
It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92. Pursuant to 10 CFR 51.22(b), no environmental assessment need be prepared in connection with the issuance of this amendment.

WCNOC requests approval of the proposed license amendment by November 1, 2002 to support the current Manager Chemistry/Radiation Protection entering the licensed operator training program and the Radiation Protection Manager function being fulfilled by the Superintendent Chemistry/Radiation Protection. Once approved, this amendment will be implemented within 30 days.

ADD1

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Kansas State Official. If you should have any questions regarding this submittal, please contact me at (620) 364-4433, or Mr. Tony Harris at (620) 364-4038.

Very truly yours,



Britt T. McKinney

BTM/rlr

Attachments: I - Affidavit  
II - Evaluation  
III - Markup of Technical Specification pages  
IV - Retyped Technical Specification pages  
V - List of Commitments

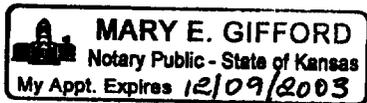
cc: V. L. Cooper (KDHE), w/a  
J. N. Donohew (NRC), w/a  
D. N. Graves (NRC), w/a  
E. W. Merschoff (NRC), w/a  
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS )  
 ) SS  
COUNTY OF COFFEY )

Britt T. McKinney, of lawful age, being first duly sworn upon oath says that he is Vice President Operations of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the contents thereof; that he has executed the same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By   
Britt T. McKinney  
Vice President Operations

SUBSCRIBED and sworn to before me this 25<sup>th</sup> day of July, 2002.



Mary E. Gifford  
Notary Public

Expiration Date 12/09/2003

**ATTACHMENT II**  
**EVALUATION**

## EVALUATION

### 1.0 DESCRIPTION

This amendment application would revise Technical Specification Chapter 5.0, "Administrative Controls," to allow the use of generic personnel titles as provided by ANSI/ANS-3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," (Reference 1) in lieu of plant specific personnel titles.

### 2.0 PROPOSED CHANGE

This amendment application proposes to revise Chapter 5.0, "Administrative Controls," to allow the use of generic personnel titles as follows:

The plant specific personnel title "Plant Manager" in Specifications 5.1.1, 5.2.1b., 5.2.2d., and 5.5.1b. is revised to "plant manager."

The plant specific personnel title "President and Chief Executive Officer" in Specification 5.2.1c. is revised to "A specified corporate officer."

The plant specific personnel title "Manager Operations" in Specifications 5.2.2e. and 5.3.1.3 is revised to "operations manager."

Specification 5.3.1.2 states: "The position of Manager Chemistry/Radiation Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager." This specification is revised to: "The Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager. The Radiation Protection Manager will be designated by the plant manager."

### 3.0 BACKGROUND

Technical Specification 5.3.1 requires each member of the Wolf Creek Generating Station (WCGS) staff meet or exceed the minimum qualifications of ANSI/ANS-3.1-1978 with exceptions for licensed operators, Manager Chemistry/Radiation Protection, and Manager Operations.

ANSI/ANS-3.1-1978 provides criteria for the selection and training of personnel for stationary nuclear power plants. This standard addresses the qualifications, responsibilities, and training of personnel in operating and support organizations appropriate for the safe and efficient operation of nuclear power plants. Individual job titles and organizational structures vary among organizations operating power reactors; therefore, the standard is predicated on levels of responsibility rather than on a particular organizational concept.

Industry technical specification task force (TSTF) traveler TSTF-065, Revision 1, "Use of generic titles for utility positions," (Reference 2), revised the improved Standard Technical Specifications (ISTS) to allow the use of generic personnel titles as provided in ANSI/ANS 3.1 in lieu of plant-specific personnel titles. In a letter dated November 10, 1994 (Reference 3), from C. I. Grimes, USNRC, the staff reviewed the proposal to use generic titles and found that lower case titles for all titles in the ISTS is acceptable. The letter stated, in part, "The titles selected by the licensee should agree with those titles in the ANSI Standard committed to in improved STS Section 5.3.

The proposed use of generic personnel titles will allow Wolf Creek Nuclear Operating Corporation (WCNOC) the flexibility to rotate management personnel into the various positions and revise position titles while still meeting the appropriate ANSI/ANS-3.1-1978 qualifications and specified exceptions. Additionally, the use of generic personnel titles will reduce and/or eliminate the need for future license amendments. There have been at least seven amendments associated with the subject personnel titles (i.e., Amendment Nos. 13, 45, 54, 58, 81, 100, and 115).

#### **4.0 TECHNICAL ANALYSIS**

The proposed changes to Technical Specification Chapter 5.0, "Administrative Controls," to allow the use of generic personnel titles as provided by ANSI/ANS-3.1-1978, in lieu of plant specific personnel titles is an administrative change. The use of generic personnel titles does not change any of the qualification requirements in the technical specifications. The unit staff will continue to meet the qualifications of ANSI/ANS 3.1-1978 as endorsed by Regulatory Guide 1.8, proposed revision 2 (February 1979) (Reference 4) with the exception as specified in Technical Specification Section 5.3. The duties and responsibilities of these positions have not changed. The relationships between the titles in ANSI/ANS-3.1-1978 and the plant specific personnel titles will be described in the Updated Safety Analysis Report (USAR).

NRC letter dated November 10, 1994, states, in part:

"This change does not eliminate any of the qualifications, responsibilities or requirements for these positions, since the plant-specific personnel titles are currently identified in licensee controlled documents such as the Final Safety Analysis Report (FSAR) or the Quality Assurance (QA) Plan. In addition, the improved STS require that these positions meet the qualifications of Regulatory Guide (RG) 1.8 or an ANSI Standard acceptable to the NRC staff. The proposal provides a more direct link between the personnel qualifications as identified in the STS and STS-required responsibilities by utilizing the same ANSI/ANS Standard position title. With the plant-specific personnel titles specified in the TS, a utility could utilize a person meeting the ANSI/ANS Standard qualifications to fulfill the TS qualification requirements while utilizing a separate person with the TS-identified title to perform the TS-required responsibilities. This is clearly not the intent of the TS requirements. The proposal will preclude this by utilizing the same generic position title for the responsibilities as contained in the qualifications requirements by reference to ANSI/ANS Standard or RG 1.8."

The proposed change to Specification 5.3.1.2 states that the "Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager. The change, will therefore permit a qualified supervisor with line responsibility for operational health physics (e.g., Superintendent Chemistry/Radiation Protection, or Supervisor Health Physics) to serve as the Radiation Protection Manager. The change to Specification 5.3.1.2 will allow the plant manager to designate the Superintendent Chemistry/Radiation Protection or Supervisor Health Physics as the Radiation Protection Manager in the event the Manager Chemistry/Radiation Protection does not meet the qualification criteria of Regulatory Guide 1.8, September 1975 (Reference 5). The Radiation Protection Manager will be designated by the plant manager. The proposed change will allow more flexibility to rotate management personnel into the position of Manager Chemistry/Radiation Protection.

## 5.0 REGULATORY ANALYSIS

This amendment application proposes to revise Chapter 5.0, "Administrative Controls," to allow the use of generic personnel titles as follows:

The plant specific personnel title "Plant Manager" in Specifications 5.1.1, 5.2.1b., 5.2.2d., and 5.5.1b. is revised to "plant manager."

The plant specific personnel title "President and Chief Executive Officer" in Specification 5.2.1c. is revised to "A specified corporate officer."

The plant specific personnel title "Manager Operations" in Specifications 5.2.2e. and 5.3.1.3 is revised to "operations manager."

Specification 5.3.1.2 states: "The position of Manager Chemistry/Radiation Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager." This specification is revised to: "The Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager. The Radiation Protection Manager will be designated by the plant manager."

### 5.1 No Significant Hazards Consideration

**(1) Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No

The proposed changes do not affect accident initiators or assumptions. The radiological consequences of an accident previously evaluated remain unchanged. These changes involve administrative changes concerning the use of personnel titles and do not affect responsibilities or qualifications of plant personnel.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

**(2) Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No

The proposed changes are administrative in nature. As such, there are no hardware changes nor are there any changes in the method by which any safety-related plant system performs its safety function. This amendment will not affect the normal method of plant operation or change any operating parameters. No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result of this amendment. There will be no adverse effects or challenges imposed on any safety-related system as a result of this amendment.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

**(3) Do the proposed changes involve a significant reduction in a margin of safety?**

Response: No

There will be no effect on the manner in which safety limits or limiting safety system settings are determined nor will there be any effect on those plant systems necessary to assure the accomplishment of protection functions. The use of generic personnel titles will not reduce any margin of safety.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, WCNOG concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c) and, accordingly, a finding of "no significant hazards consideration" is justified.

**5.2 Applicable Regulatory Requirements/Criteria**

The regulatory bases and guidance documents include:

10 CFR 50.34(b)(6)(i) of 10 CFR Part 50, "Licensing of Production and Utilization Facilities," requires that applications for a license to operate a nuclear power plant include information concerning organizational structure, personnel qualifications, and related matters.

ANSI/ANS-3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," provides criteria for the selection and training of personnel for stationary nuclear power plants. The standard addresses the qualifications, responsibilities, and training of personnel in operating and support organizations appropriate for the safe and efficient operation of nuclear power plants.

Regulatory Guide 1.8, September 1975 and proposed revision 2 (February 1979), describes a method acceptable to the NRC staff for implementing 10 CFR 50.34(b)(6)(i) of the Commission's regulations with regard to personnel qualifications.

Based on the considerations discussed above, (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) issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

**6.0 ENVIRONMENTAL CONSIDERATION**

WCNOG has determined that the proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures and requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

## **7.0 REFERENCES**

1. ANSI/ANS-3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," January 17, 1978.
2. Industry Technical Specification Task Force (TSTF) traveler TSTF-065, Revision 1, "Use of generic titles for utility positions."
3. NRC letter dated November 10, 1994 from C. I. Grimes, USNRC to L. Bush (WOG), B. Mann (CEOG), C. Szabo (BWOG), and A. Maron (BWROG).
4. Regulatory Guide 1.8, proposed revision 2, "Personnel Selection and Training," February 1979.
5. Regulatory Guide 1.8, Revision 1-R, "Personnel Selection and Training," September 1975.

The proposed changes to Specification 5.3.1.2 are consistent with the changes approved in Amendment No. 92 for the Callaway Plant dated September 6, 1994.

**ATTACHMENT III**  
**MARKUP OF TECHNICAL SPECIFICATION PAGES**

## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- 5.1.2 The Control Room Supervisor under the Shift Manager shall be responsible for the control room command function. During any absence of the Control Room Supervisor from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the Control Room Supervisor from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Operating Organizations

Onsite and operating organizations shall be established for unit operation and corporate management, respectively. The onsite and operating organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the USAR;
- b. The Plant Manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. ~~The President and Chief Executive Officer~~ shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

A specified corporate officer

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A nuclear station operator shall be assigned when fuel is in the reactor and an additional nuclear station operator shall be assigned when the unit is in MODE 1, 2, 3, or 4.
- b. Shift crew composition may be one less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty

(continued)

5.2 Organization

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5.2.2 Unit Staff (continued)

shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

- c. An individual from the Health Physics Group qualified in radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- d. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operator (SROs), licensed Reactor Operator (ROs), health physics technicians, nuclear station operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime. Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or the Plant Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

- e. The Superintendent Operations or Manager Operations shall hold an SRO license. ↑  
operations manager
- f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This position shall be manned in MODES 1, 2, 3 or 4, unless the Shift Manager or the individual with a Senior Operator License meets the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

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5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 with the following exceptions:

5.3.1.1 Licensed Operators and Senior Operators shall meet or exceed the qualifications of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, and 10 CFR Part 55.

5.3.1.2 ~~The position of Manager Chemistry/Radiation Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager.~~

The Radiation Protection Manager will be designated by the plant manager.

5.3.1.3 The position of ~~Manager Operations~~ shall hold or have previously held a senior reactor operator license for a similar unit (PWR).

operations manager

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).

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The Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds

## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

#### 5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
  2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after the approval of the ~~Plant Manager~~ ; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

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**ATTACHMENT IV**  
**RETYPE TECHNICAL SPECIFICATION PAGES**

## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- 5.1.2 The Control Room Supervisor under the Shift Manager shall be responsible for the control room command function. During any absence of the Control Room Supervisor from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the Control Room Supervisor from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Operating Organizations

Onsite and operating organizations shall be established for unit operation and corporate management, respectively. The onsite and operating organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the USAR;
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A nuclear station operator shall be assigned when fuel is in the reactor and an additional nuclear station operator shall be assigned when the unit is in MODE 1, 2, 3, or 4.
- b. Shift crew composition may be one less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty

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## 5.2 Organization

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### 5.2.2 Unit Staff (continued)

shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

- c. An individual from the Health Physics Group qualified in radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- d. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operator (SROs), licensed Reactor Operator (ROs), health physics technicians, nuclear station operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime. Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

- e. The Superintendent Operations or operations manager shall hold an SRO license.
  - f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This position shall be manned in MODES 1, 2, 3 or 4, unless the Shift Manager or the individual with a Senior Operator License meets the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

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- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 with the following exceptions:
- 5.3.1.1 Licensed Operators and Senior Operators shall meet or exceed the qualifications of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, and 10 CFR Part 55.
  - 5.3.1.2 The Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager. The Radiation Protection Manager will be designated by the plant manager.
  - 5.3.1.3 The operations manager shall hold or have previously held a senior reactor operator license for a similar unit (PWR).
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

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The following programs shall be established, implemented, and maintained.

#### 5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
  2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after the approval of the plant manager; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

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### LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Tony Harris, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4038.

<b>COMMITMENT</b>	<b>Due Date/Event</b>
The relationships between the titles in ANSI/ANS-3.1-1978 and the plant specific personnel titles will be described in the Updated Safety Analysis Report (USAR).	Upon implementation
Once approved, this amendment will be implemented within 30 days.	Within 30 days of NRC approval