

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Britt T. McKinney
Vice President Operations

SEP 19 2002

WO 02-0051

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

- References:
1. Letter WO 01-0038, dated September 22, 2001, from B. T. McKinney, WCNO, to USNRC
 2. Letter WO 02-0032, dated June 27, 2002, from B. T. McKinney, WCNO, to USNRC

Subject: Docket No. 50-482: Modification to Application for Amendment to Revise Technical Specification 5.3, "Unit Staff Qualifications"

Gentlemen:

Reference 1 submitted an application to amend Technical Specification (TS) 5.3, "Unit Staff Qualifications," for the Wolf Creek Generating Station, Unit 1, Facility Operating License No. NPF-42, in accordance with 10 CFR 50.90.

Reference 1 proposed to revise TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 to specify an exception that requires licensed operators to comply with the requirements of the National Academy for Nuclear Training guidelines for initial training and qualification in lieu of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2. Specification 5.3.1.1 was proposed to be revised to state:

"Licensed Operators and Senior Operators shall meet or exceed the qualifications of the National Academy for Nuclear Training, "Guidelines for Initial Training and Qualification of Licensed Operators," January 2000."

Subsequent discussions with Institute of Nuclear Power Operations (INPO) personnel and NRC personnel resulted in Reference 2 proposing revisions to Specification 5.3.1.1. Specific concerns were identified with referencing an INPO document in the TS. Reference 2 proposed Specification 5.3.1.1 be revised to state:

"The education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those approved by the NRC and described in an applicable station procedure."

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Further discussions with NRC personnel in August 2002 identified NRC concerns that the document containing or referencing the specific education and experience eligibility requirements should be specifically identified (e.g., document title and date) in the TS and be available in the public domain. As a result of these discussions, it is proposed to revise Specification 5.3.1.1 to state:

"The education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC, specifically those referenced in letter dated September 19, 2002, (WO 02-0051)."

The NRC has published NRC Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001, "to familiarize addressees with the NRC's current guidelines for the qualification and training of reactor operator (RO) and senior operator (SO) license applicants." RIS 2001-01 makes the following statements:

"The fact that every facility licensee has voluntarily obtained and periodically renewed the accreditation of its licensed operator training program suggests that every facility is implementing the education and experience guidelines endorsed by the NNAB. The NRC staff understands that the current version of these guidelines are outlined by the National Academy for Nuclear Training (NANT) in its "Guidelines for Initial Training and Qualification of License Operators," (NANT 2000 guidelines) which were issued in January 2000."

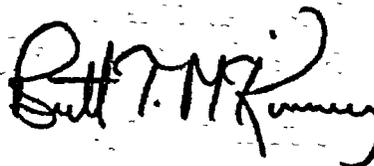
".... The NANT's guidelines for education and experience (those that were in effect in 1987 or those that were issued in January 2000) outline acceptable methods for implementing the Commission's regulations in this area."

As such, Wolf Creek Nuclear Operating Corporation (WCNOC) requests the NRC approve the methods described in the NANT (ACAD 00-003), "Guidelines for Initial Training and Qualification of Licensed Operators," dated January 2000, for meeting the education and experience eligibility requirements at the Wolf Creek Generating Station. INPO letter dated August 13, 2002, from W. J. Hastie, INPO, to D. B. Pinckney, USNRC, provided ACAD 00-003 for placement in the Public Document Room.

The proposed change to Specification 5.3.1.1, provided in Attachment II, supersedes the change proposed in Attachment III of Reference 1 and Attachment II of Reference 2. The proposed change to Specification 5.3.1.1 provided in this submittal does not impact the conclusions of the No Significant Hazards Consideration provided in Reference 1.

There are no licensing commitments contained in this submittal. In accordance with 10 CFR 50.91, a copy of this correspondence is being provided to the appropriate Kansas State Official. If you should have any questions regarding this submittal, please contact me at (620) 364-4112, or Mr. Tony Harris at (620) 364-4038.

Very truly yours,

A handwritten signature in black ink, appearing to read "Britt T. McKinney". The signature is written in a cursive style with a large, stylized initial "B".

Britt T. McKinney

BTM/rir
Attachments

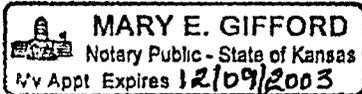
cc: V. L. Cooper (KDHE), w/a
J. N. Donohew (NRC), w/a
D. N. Graves (NRC), w/a
E. W. Merschoff (NRC), w/a
Senior Resident Inspector (NRC), w/a

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*
Britt T. McKinney
Vice President Operations

SUBSCRIBED and sworn to before me this 19 day of Sept., 2002.

 MARY E. GIFFORD
Notary Public - State of Kansas
My Appt Expires 12/09/2003

Mary E. Gifford
Notary Public

Expiration Date 12/09/2003

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

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.

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).

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).

The education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC, specifically those referenced in letter dated September 19, 2002 (WO 02-0051).