

November 6, 2002

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

SUBJECT: WOLF CREEK GENERATING STATION - ISSUANCE OF AMENDMENT
RE: GENERIC PERSONNEL IN ADMINISTRATIVE CONTROLS
(TAC NO. MB5725)

Dear Mr. Maynard:

The Commission has issued the enclosed Amendment No. 149 to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated July 25, 2002 (WO 02-0031), as supplemented by letter dated August 30, 2002 (WO 02-0046).

The amendment revises paragraphs in Section 5.0, "Administrative Controls," of the TSs to allow the use of generic personnel titles in place of plant-specific personnel titles.

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,

/RA/

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

Docket No. 50-482

Enclosures: 1. Amendment No. 149 to NPF-42
2. Safety Evaluation

cc w/encls: See next page

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PKG: ML023170593

ACCESSION NO.: ML023170628 Nrr-058

TS: ML023110270 NRR-100

NLOw/comments

OFFICE	PDIV-2/PM	PDIV-2/LA	IEHB/SC	TSS/SC	OGC	PDIV-2/SC
NAME	JDonohew:rkb	EPeyton	DTrimble	RDennig	RWeisman	SDembek
SECTIONS			4.2, 4.3	4.1, 4.3		
DATE	10/1/2002	9/27/02	10/10/02	10/22/2002	31 Oct.,2002	11/5/02

DOCUMENT NAME: C:\MYFILES\Copies\wc AMD-MB5725-generic titles.wpd OFFICIAL RECORD COPY

OGC corrections made

JND 11/1/02

Wolf Creek Generating Station

cc:

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WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.149
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 July 25, 2002,, as supplemented by letter dated August 30, 2002, 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.

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. 149, 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 30 days of the date of issuance including the approval of the Updated Safety Analysis Report (USAR) change request that incorporates the relationships between the titles in ANSI/ANS-3.1-1978 and the plant-specific personnel titles in the USAR, as described in the licensee's letters of July 25 and August 30, 2002.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

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

Attachment: Changes to the Technical
Specifications

Date of Issuance: November 6, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 149

FACILITY OPERATING LICENSE NO. NPF-42

DOCKET NO. 50-482

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change. The corresponding overleaf pages are provided to maintain document completeness.

REMOVE

5.0-1
5.0-2
5.0-3
5.0-4
5.0-6

INSERT

5.0-1
5.0-2
5.0-3
5.0-4
5.0-6

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 149 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 July 25, 2002, as supplemented by letter dated August 30, 2002, 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 paragraphs in TS 5.0, "Administrative Controls," of the TSs 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 place of plant-specific personnel titles.

The licensee has proposed to revise position titles in TS 5.1, "Responsibility," TS 5.2.1, "Onsite and Operating Organization," TS 5.2.2, "Unit Staff," TS 5.3, "Unit Staff Qualifications," and TS 5.5.1, "Offsite Dose Calculation Manual (ODCM)."

The supplemental letter dated August 30, 2002, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on August XX, 2002 (67 FR XXXXX).

2.0 BACKGROUND

The licensee adopted the Improved Technical Specifications (ITS) in License Amendments No. 123 (issued March 31, 1999) based on NUREG-1431, "Standard Technical Specifications [STS], Westinghouse Plants," Revision 1, dated April 1995. Since then, industry and the NRC staff have been working to improve the ITS, in NUREG-1430 through NUREG-1434 for the different plant vendors, and as a result, generic changes have been developed for the standard ITS in NUREG-1431.

In its application, the licensee stated that the proposed amendment is consistent with the NRC-approved Technical Specification Task Force (TSTF) Traveler Number 65, Revision 1, "Use of Generic Titles for Utility Positions." The TSTF was approved by the NRC staff for the use of licensees in proposing changes to plant-specific TSs based on NUREG-1431 for Westinghouse plants, and the TSs for WCGS are based on NUREG-1431. In reviewing the

TSTF, the NRC staff agrees that the TSTS applies to WCGS, and the proposed amendment is consistent with the TSTF.

TSTF-65, Revision 1 (hereafter known as TSTF-65) revises TSs 5.1, 5.2.1, 5.2.2, and 5.5.1 to allow the use of generic personnel titles in the TSs as provided in ANSI/ANS 3.1, "Selection, Qualification, and Training of Personnel for Nuclear Power plants," in lieu of plant-specific personnel titles. The licensee's purpose for proposing to add TSTF-65 to the TSs for WCGS is the same purpose that the staff stated in approving the TSTF for NUREG-1431. In the TS Bases changes given in TSTF-65, the TSTF specified that the ANSI standard for titles shall be the same standard referenced in TS 5.3 for unit staff qualifications and that the unit staff titles shall be specified in the Final Safety Analysis Report or Quality Assurance Plan for the plant in which changes to the titles would be controlled by 10 CFR 50.59 or 50.54(a), respectively. As stated in TS 5.3.1.1, the ANSI standard referenced in the TSs for unit staff qualifications is "ANSI/ANS 3.1-1978 as endorsed by Regulatory Guide 1.8, Revision 2, and 10 CFR Part 55."

3.0 REGULATORY REQUIREMENTS

Paragraph 50.34(b)(6)(i) of Title 10 of the Code of Federal Regulations (CFR) requires that the final safety analysis report for a license to operate a nuclear power plant include information concerning the organizational structure, personnel qualifications, and related matters.

Paragraph 50.36(c)(5) requires administrative controls related to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. In meeting 10 CFR 50.36(c)(5), the TSs list requirements on the organization for the safe operation of the facility, including listing titles of positions within the organization structure. Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," provides an acceptable method for implementing 10 CFR 50.34(b)(6)(i).

4.0 TECHNICAL EVALUATION

The licensee proposed the following changes to the Administrative Controls section of the TSs for WCGS:

1. For TS 5.1.1, replace "Plant Manager" by "plant manager."
2. For TS 5.2.1.a, add the phrase "including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in the Technical Specifications" in the sentence that "These requirements shall be documented in the USAR."
3. For TS 5.2.1.b, replace "Plant Manager" by "plant manager."
4. For TS 5.2.1.c, replace "The President and Chief Executive Officer" by "A specified corporate officer."
5. For 5.2.2.d, replace "Plant Manager" by "plant manager" in two places.
6. For TS 5.2.2.e, replace "Manager Operations" by "operations manager."

7. For TS 5.3.1.2, replace "Manager Chemistry/Radiation Protection" by "Radiation Protection Manager."
8. For TS 5.3.1.3, replace position of Manager Operations" by "operations manager."
9. For TS 5.5.1, the second item b, replace "Plant Manager" by "plant manager," and
10. For TS 5.3.1.2, revise the phrase "The position of Manager Chemistry/Radiation Protection shall meet or exceed" to state that the Radiation Protection Manager shall be a supervisor with the responsibility for operational health physics, and add the sentence that "The Radiation Protection Manager will be designated by the plant manager."

The first 9 changes above are TSTF-65, and the last change (number 10 above) is a change that is in addition to the TSTF. These proposed changes are addressed below.

4.1 TSTF-65 Changes

The TSTF-65 changes are changes 1 through 9 listed above. These changes are the same changes shown in the NRC-approved TSTF. In its application, the licensee stated that the proposed changes to the TSs involving TSTF-65 are to allow the use of generic personnel titles as provided by ANSI/ANS-3.1-1978 in lieu of plant-specific personnel and these changes are an administrative in nature. The proposed changes are to (1) allow the licensee the flexibility to rotate management personnel into the various positions and revise position titles while still meeting the appropriate ANSI/ANS-3.3-1978 qualifications and (2) to eliminate the need for future license amendment involving plant-specific position titles.

The licensee explained that the use of generic personnel titles in the amendment does not change any of the qualifications or any of the duties and responsibilities of the positions affected in the proposed changes. The relationships between the titles in ANSI/ANS-3.1-1978 and the plant-specific personnel titles will be described in the Updated Final Safety Analysis Report (USAR), as is required by the words proposed to be added to TS 5.2.1.a. As stated in TS 5.3.1.1, the ANSI standard referenced in the TSs for unit staff qualifications is ANSI/ANS 3.1-1978 and this standard has been endorsed by RG 1.8, Revision 2, and 10 CFR Part 55.

This includes the proposed change to TS 5.3.1.2 to replace the title "Manager Chemistry/Radiation Protection" by the generic title "Radiation Protection," even though the proposed change to TS 5.3.1,2 is not shown in TSTF-68. Because the proposed change to TS 5.3.1.2 involves the replacement of a plant-specific position title by a generic title in ANSI/ANS-3.1-1978, the staff concludes that this change is the same as the title changes shown in TSTF-68. In other words, TSTF-68 was not intended to show the only title

changes to be made in plant-specific TSs.

There are title changes in TSTF-65 that were not proposed by the licensee. These changes were to the following TSs: (1) TS 2.2 on safety limit violations being reported to, and License Event Reports being submitted to, identified positions within the licensee's organization and (2) TSs 5.2.2 and 5.7.1 on the title for Health Physics Technicians. In reviewing these parts of the TSs for WCGS, it was determined that the specific TSs shown changed in the TSTF and the

title "Health Physics Technician" were not in the TSs for WCGS. Therefore, the staff concludes that these changes identified in the TSTF are not needed for the WCGS TSs.

Based on the proposed changes are the changes in TSTF-65, the changes do not change any of the qualifications or any of the duties and responsibilities of the positions affected in the changes, the relationship between the titles of these positions and the titles in ANSI/ANS-3.3-1978 standard will be delineated in the USAR, and this standard is referenced in the TSs for unit staff qualifications, the staff concludes that the proposed changes listed above (i.e., changes No. 1 through 8) to incorporate TSTF-65 in the TSs are acceptable.

4.2 Changes Other Than TSTF-65

For TS 5.3.1.2, in addition to TSTF-65 which includes the change discussed above in changing the title of "Manger Chemistry/Radiation Protection" to "Radiation Protection Manger," the licensee has also proposed to revise the TSs on unit staff qualifications by adding the following two requirements:

- The Radiation Protection Manager shall be a supervisor with the responsibility for operational health physics, and
- The Radiation Protection Manager will be designated by the plant manager.

In TS 5.3.1.2, the current requirements are that the position of Manger Chemistry/Radiation Protection shall meet or exceed the qualifications of RG 1.8, dated September 1975, for a radiation Protection Manager. The licensee stated that the change will permit a qualified supervisor with line responsibility for operational health physics, which for WCGS are the Superintendent Chemistry/Radiation Protection, the Supervisor Health Physics, or the Manager Chemistry/Radiation Protection, to serve in the position of Radiation Protection Manager and, thus, will allow the plant manager to designate which of the three is the Radiation Protection Manager. This, the licensee stated, is to provide more flexibility to rotate management personnel into the position of Manager Chemistry/Radiation Protection. The specific WCGS position that is the Radiation Protection Manager would be delineated

in the USAR.

Because the proposed additional requirements are consistent with requirements in RG 1.8 for the position of radiation protection and because radiation protection includes operational health physics, the staff concludes that the proposed change is acceptable.

4.3 Conclusion

Based on the conclusions drawn in Sections 3.1 and 3.3, including the incorporation of the relationships between the titles in ANSI/ANS-3.1-1978 and the plant-specific personnel titles in the USAR, the staff concludes that the proposed amendment is acceptable. The licensee has agreed to approve the USAR change request that incorporates the relationships between the titles in ANSI/ANS-3.1-1978 and the plant-specific personnel titles in the USAR, as described in the licensee's letters of July 25 and August 30, 2002, during the implementation of the amendment. This will be made a condition of the amendment. The full incorporation of the change into the USAR would then occur in the next update of the USAR by the licensee in accordance with the 10 CFR 50.71(e). This is acceptable to the staff.

Based on the above, the staff also concludes that the amendment also meets the requirements of the regulations (i.e., 10 CFR 50.34(b)(6)(i) and 50.36(c)(5)). This is to say that the USAR for the license to operate WCGS includes information concerning the organizational structure and personnel qualifications and the TSs list requirements on the organization for the safe operation of the facility, including listing titles of positions within the organization structure.

5.0 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.

6.0 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 (67 FR XXXXX).

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.

7.0 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: Jack Donohew

Date: November 6, 2002