WOLF CREEK
NUCLEAR OPERATING CORPORATION

Britt T. McKinney
Site Vice President

FEB 9 2004

WO 04-0001

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

Subject: Docket No. 50-482: Application for Technical Specification Improvement to Extend the Inspection Interval for Reactor Coolant Pump Flywheels Using the Consolidated Line Item Improvement Process

Gentlemen:

Pursuant to 10 CFR 50.90, Wolf Creek Nuclear Operating Corporation (WCNOC) hereby requests an amendment to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS).

The proposed amendment will extend the reactor coolant pump (RCP) motor flywheel examination frequency from the currently approved 10-year inspection interval, to an interval not to exceed 20 years. The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)." The availability of this Technical Specification (TS) improvement was announced in the Federal Register on October 22, 2003, as part of the consolidated line item improvement process (CLIIP).

Attachment I provides a description of the proposed change and the requested confirmation of applicability. Attachment II provides the existing TS pages marked-up to show the proposed change. Attachment III provides revised, clean TS pages. Attachment IV provides a list of commitments made in this application.

This amendment application was reviewed by the Plant Safety Review Committee and the Nuclear Safety Review Committee. In accordance with 10 CFR 50.91, a copy of this amendment application, with attachments, is being provided to the designated Kansas State official.

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WCNOC requests approval of the proposed amendment request by October 1, 2004, to support scheduling activities associated with Refueling Outage 14. It is anticipated that the license amendment, as approved, will be effective upon issuance and will be implemented within 90 days from the date of issuance. Please contact me at (620) 364-4112 or Mr. Kevin Moles at (620) 364-4126 for any questions you may have regarding this application.

Sincerely,

Britt T. McKinney

BTM/rlg

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

cc: V. L. Cooper (KDHE), w/a
J. N. Donohew (NRC), w/a
D. N. Graves (NRC), w/a
B. S. Mallett (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 Site Vice President 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
Site Vice President

SUBSCRIBED and sworn to before me this 9TH day of FEB, 2004.

MARY E. GIFFORD
Notary Public - State of Kansas
My Appt. Expires 12|09|2007

Mary E. Gifford
Notary Public

Expiration Date 12|09|2007

EVALUATION

1.0 DESCRIPTION

The proposed amendment would revise Technical Specification (TS) 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program." The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)." The availability of this TS improvement was announced in the Federal Register on October 22, 2003, as part of the consolidated line item improvement process (CLIIP).

2.0 PROPOSED CHANGE

Consistent with the NRC-approved TSTF-421, the proposed TS change includes the following revision to TS 5.5.7:

> The examination interval for the reactor coolant pump (RCP) flywheels is changed from once every ten years coinciding with the inservice inspection schedule as required by ASME Section XI to 20 year intervals.

Additional minor editorial changes are made to this specification for consistency with NUREG-1431, Revision 2, "Standard Technical Specifications – Westinghouse Plants."

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on October 22, 2003 (68 FR 60422), NRC Notice for Comment published June 24, 2003 (68 FR 37590), TSTF-421, WCAP-15666, "Extension of Reactor Coolant Pump Motor Flywheel Examination," and the related NRC safety evaluation (SE) dated May 5, 2003.

4.0 TECHNICAL ANALYSIS

Wolf Creek Nuclear Operating Corporation (WCNOC) has reviewed the model SE published on June 24, 2003 (68 FR 37590), and verified its applicability as part of the CLIIP. This verification included a review of the NRC staff's model SE, as well as the information provided to support TSTF-421 (including WCAP-15666 and the related SE dated May 5, 2003). WCNOC has concluded that the justifications presented in the TSTF proposal and the model SE prepared by the NRC staff are applicable to the Wolf Creek Generating Station (WCGS) and justify this amendment for the incorporation of the changes to the WCGS TS.

5.0 REGULATORY ANALYSIS

This section addresses the standards of 10 CFR 50.92 as well as the applicable regulatory requirements and acceptance criteria.

5.1 NO SIGNIFICANT HAZARDS CONSIDERATION

WCNOC has reviewed the proposed no significant hazards consideration determination published on June 24, 2003 (68 FR 37590) as part of the CLIIP. WCNOC has concluded that the proposed determination presented in the notice is applicable to WCGS and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91 (a).

5.2 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA

A description of this proposed change and its applicable regulatory requirements and guidance was provided in the NRC notices related to the CLIIP, TSTF-421, topical report WCAP-15666, and the associated NRC SE.

6.0 ENVIRONMENTAL CONSIDERATION

WCNOC has reviewed the environmental evaluation included in the model SE published on June 24, 2003 (68 FR 37590) as part of the CLIIP. WCNOC has concluded that the staff's findings presented in that evaluation are applicable to WCGS and the evaluation is hereby incorporated by reference for this application.

7.0 REFERENCES

1. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published October 22, 2003 (68 FR 60422).

2. Federal Register Notice: Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published June 24, 2003 (68 FR 37590).

3. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)," Revision 0, November 2001.

4. WCAP-15666-A, "Extension of Reactor Coolant Pump Motor Flywheel Examination," Revision 1, October 2003.

5. NRC letter dated May 5, 2003, from H. Berkow to R. Bryan (WOG), "Safety Evaluation of Topical Report WCAP-15666, "Extension of Reactor Coolant Pump Motor Flywheel Examination" (TAC NO. MB2819)."

ATTACHMENT II
MARKUP OF TECHNICAL SPECIFICATION PAGES

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

k. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the USAR, Section 3.9(N), cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Containment Tendon Surveillance Program

This program provides controls for monitoring tendon performance, including the effectiveness of the tendon corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial plant operation as well as periodic testing thereafter. The Containment Tendon Surveillance Program, and its inspection frequencies and acceptance criteria, shall be in accordance with Wolf Creek Generating Station position on draft Revision 3 of Regulatory Guide 1.35, dated April, 1979.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975. In lieu of Position C.4.b(1) and C.4.b(2), ~~conduct~~ a qualified in place UT examination over the volume from the inner bore

(continued)

5.5 Programs and Manuals

5.5.7 Reactor Coolant Pump Flywheel Inspection Program (continued)

of the flywheel to the circle of one-half the outer radius or conduct a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels once every ten years coinciding with the inservice inspection schedule as required by ASME Section XI.

may be conducted at 20 year intervals.

5.5.8 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

(continued)

ATTACHMENT III
RETYPED TECHNICAL SPECIFICATION PAGES

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

k. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the USAR, Section 3.9(N), cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Containment Tendon Surveillance Program

This program provides controls for monitoring tendon performance, including the effectiveness of the tendon corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial plant operation as well as periodic testing thereafter. The Containment Tendon Surveillance Program, and its inspection frequencies and acceptance criteria, shall be in accordance with Wolf Creek Generating Station position on draft Revision 3 of Regulatory Guide 1.35, dated April, 1979.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

In lieu of Position C.4.b(1) and C.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer

(continued)

5.5 Programs and Manuals

5.5.7 Reactor Coolant Pump Flywheel Inspection Program (continued)

radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels may be conducted at 20 year intervals.

5.5.8 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

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Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

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LIST OF COMMITMENTS

The following table identifies those actions committed to by 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. Kevin Moles at (620) 364-4126.

COMMITMENT	Due Date/Event
The proposed changes to the WCGS Technical Specifications will be implemented within 90 days of NRC approval.	Within 90 days of NRC approval.