

# WOLF CREEK NUCLEAR OPERATING CORPORATION

Donna Jacobs  
Vice President Operations and Plant Manager

**JUL 23 2004**

WO 04-0035

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

**Subject: Docket No. 50-482: Application for Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports 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 would delete the Technical Specification (TS) requirements to submit Monthly Operating Reports and Occupational Radiation Exposure Reports. The proposed TS changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), as part of the consolidated line item improvement process (CLIP).

Attachment I provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications and commitments. Attachment II provides the existing TS pages marked-up to show the proposed change. Attachment III provides revised, clean TS pages. Attachment IV contains a list of commitments.

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.

A001  
IE56  
IE24

WCNOC requests approval of the proposed amendment by November 15, 2004. The changes proposed are not required to address an immediate safety concern. It is anticipated that the license amendment, as approved, will be effective upon issuance, to be implemented within 90 days from the date of issuance. Please contact me at (620) 364-4246 or Mr. Kevin Moles at (620) 364-4126 for any questions you may have regarding this application.

Very truly yours,

  
Donna Jacobs

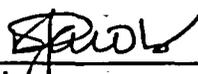
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Attachments: I - Evaluation  
II - Markup of Technical Specification pages  
III - Retyped Technical Specification pages  
IV - List of Commitments

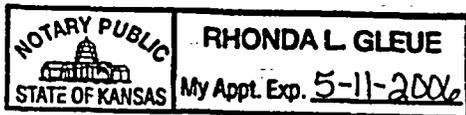
cc: V. L. Cooper (KDHE), w/a  
J. N. Donohew (NRC), w/a  
D. N. Graves (NRC), w/a  
B. S. Mallett (NRC), w/a  
Senior Resident Inspector (NRC), w/a

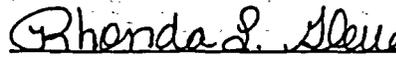
STATE OF KANSAS )  
 ) SS  
COUNTY OF COFFEY )

Donna Jacobs, of lawful age, being first duly sworn upon oath says that she is Vice President Operations and Plant Manager of Wolf Creek Nuclear Operating Corporation; that she has read the foregoing document and knows the contents thereof; that she 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 her knowledge, information and belief.

By   
Donna Jacobs  
Vice President Operations and Plant Manager

SUBSCRIBED and sworn to before me this 23<sup>rd</sup> day of July, 2004.



  
Notary Public  
Expiration Date 5-11-2006

## EVALUATION

### 1.0 DESCRIPTION

The proposed amendment deletes the requirements in Technical Specification (TS) 5.6.1 for an annual report on occupational radiation exposures and TS 5.6.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIIP).

### 2.0 PROPOSED CHANGE

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 5.6.1	Occupational Radiation Exposure Report	Deleted
TS 5.6.4	Monthly Operating Reports	Deleted

WCNOC is proposing not to renumber the Specifications in Section 5.6 as proposed in TSTF-369, Revision 1. This is consistent with the manner in which the current WCGS Technical Specifications have been formatted (e.g. TS 5.6.7 and TS 5.6.9). Renumbering of the Specifications in Section 5.6 would result in additional unnecessary procedure changes.

### 3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Revision 1.

### 4.0 TECHNICAL ANALYSIS

Wolf Creek Nuclear Operating Corporation (WCNOC) has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE and the information provided to support TSTF-369, Revision 1. WCNOC has concluded that the justifications presented in the TSTF proposal and the 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**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Revision 1.

### **5.1 NO SIGNIFICANT HAZARDS CONSIDERATION**

WCNOC has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIP. 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**

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Revision 1.

### **5.3 VERIFICATION AND COMMITMENTS**

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, WCNOC is making the following verifications and regulatory commitments:

1. WCNOC is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)). The regulatory commitment to provide the operating data that is described in Generic Letter 97-02 will be included in the Technical Requirements Manual.
2. WCGS does not have different reactor types or both operating and shutdown reactors.

## **6.0 ENVIRONMENTAL CONSIDERATION**

WCNOC has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIP. 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 Specifications Improvement To Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).
2. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1.

This application is being made in accordance with the CLIP. WCNOC is not proposing variations or deviations from the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

**ATTACHMENT II  
MARKUP OF TECHNICAL SPECIFICATION PAGES**

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5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

Not Used.

5.6.1

Occupational Radiation Exposure Report

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

5.6.2

Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in a format similar to the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

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5.6 Reporting Requirements (continued)

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5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

Not Used.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Specification 3.1.3: Moderator Temperature Coefficient (MTC),
  2. Specification 3.1.5: Shutdown Bank Insertion Limits,
  3. Specification 3.1.6: Control Bank Insertion Limits,
  4. Specification 3.2.3: Axial Flux Difference,
  5. Specification 3.2.1: Heat Flux Hot Channel Factor,  $F_q(Z)$ ,
  6. Specification 3.2.2: Nuclear Enthalpy Rise Hot Channel Factor ( $F_{\Delta H}^N$ ),
  7. Specification 3.9.1: Boron Concentration,
  8. SHUTDOWN MARGIN for Specification 3.1.1 and 3.1.4, 3.1.5, 3.1.6, and 3.1.8,
  9. Specification 3.3.1: Overtemperature  $\Delta T$  and Overpower  $\Delta T$  Trip Setpoints,

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**ATTACHMENT III  
RETYPE TECHNICAL SPECIFICATION PAGES**

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Not Used.

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in a format similar to the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Not Used.

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5.6 Reporting Requirements (continued)

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5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Specification 3.1.3: Moderator Temperature Coefficient (MTC),
  2. Specification 3.1.5: Shutdown Bank Insertion Limits,
  3. Specification 3.1.6: Control Bank Insertion Limits,
  4. Specification 3.2.3: Axial Flux Difference,
  5. Specification 3.2.1: Heat Flux Hot Channel Factor,  $F_Q(Z)$ ,
  6. Specification 3.2.2: Nuclear Enthalpy Rise Hot Channel Factor ( $F_{\Delta H}^N$ ),
  7. Specification 3.9.1: Boron Concentration,
  8. SHUTDOWN MARGIN for Specification 3.1.1 and 3.1.4, 3.1.5, 3.1.6, and 3.1.8,
  9. Specification 3.3.1: Overtemperature  $\Delta T$  and Overpower  $\Delta T$  Trip Setpoints,
  10. Specification 3.4.1: Reactor Coolant System pressure, temperature, and flow DNB limits, and
  11. Specification 2.1.1: Reactor Core Safety Limits.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
1. WCNOC Topical Report TR 90-0025 W01, "Core Thermal Hydraulic Analysis Methodology for the Wolf Creek Generating Station."
  2. WCAP-11397-P-A, "Revised Thermal Design Procedure."
  3. WCNOC Topical Report NSAG-006, "Transient Analysis Methodology for the Wolf Creek Generating Station."

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5.6 Reporting Requirements

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5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued)

4. WCAP-10216-P-A, "Relaxation of Constant Axial Offset Control -  $F_Q$  Surveillance Technical Specification."
  5. WCNOC Topical Report NSAG-007, "Reload Safety Evaluation Methodology for the Wolf Creek Generating Station."
  6. NRC Safety Evaluation Report dated March 30, 1993, for the "Revision to Technical Specification for Cycle 7."
  7. WCAP-10266-P-A, "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code."
  8. WCAP-11596-P-A, "Qualification of the Phoenix-P/ANC Nuclear Design System for Pressurized Water Reactor Cores."
  9. WCAP 10965-P-A, "ANC: A Westinghouse Advanced Nodal Computer Code."
  10. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report."
  11. WCAP-8745-P-A, "Design Bases for the Thermal Power  $\Delta T$  and Thermal Overtemperature  $\Delta T$  Trip Functions."
- c. *The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.*
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

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(continued)

5.6 Reporting Requirements

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5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, hydrostatic testing, and PORV lift settings as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:
  - 1. Specification 3.4.3, "RCS Pressure and Temperature (P/T) Limits," and
  - 2. Specification 3.4.12, "Low Temperature Overpressure Protection System."
- b. The analytical methods used to determine the RCS pressure and temperature and Cold Overpressure Mitigation System limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
  - 1. NRC letter dated December 2, 1999, "Wolf Creek Generating Station, Acceptance for Referencing of Pressure Temperature Limits Report (TAC No. MA4572)," and
  - 2. WCAP-14040-NP-A, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves," January, 1996.
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6.7 Not Used.

5.6.8 PAM Report

When a report is required by Condition B or G of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.9 Not Used.

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## 5.6 Reporting Requirements

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### 5.6.10 Steam Generator Tube Inspection Report

- a. Within 15 days following the completion of each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Commission.
  - b. The complete results of the steam generator tube inservice inspection shall be submitted to the Commission in a report within 12 months following completion of the inspection. This Special Report shall include:
    - 1) Number and extent of tubes inspected,
    - 2) Location and percent of wall-thickness penetration for each indication of an imperfection, and
    - 3) Identification of tubes plugged.
  - c. Results of steam generator tube inspections, which fall into Category C-3, shall be reported in a Special Report to the Commission within 30 days and prior to resumption of plant operation. This report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.7 High Radiation Area

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As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

#### 5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation:

- a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
- b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual or group entering such an area shall possess:
  1. A radiation monitoring device that continuously displays radiation dose rates in the area; or
  2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
  3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or
  4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

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5.7 High Radiation Area

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5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation: (continued)

- (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
  - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
- e. Except for individuals qualified in radiation protection procedures, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation:

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:
  - 1. All such door and gate keys shall be maintained under the administrative control of the Shift Manager/Control Room Supervisor or health physics supervision, or his or her designee.
  - 2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

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5.7 High Radiation Area

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5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation: (continued)

- c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual or group entering such an area shall possess:
  - 1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
  - 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
  - 3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
    - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
    - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area, or
  - 3. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.

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5.7 High Radiation Area

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5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation: (continued)

- e. Except for individuals qualified in radiation protection procedures or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.
  - f. Such individual areas that are within a larger area, such as PWR containment, where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.
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### LIST OF COMMITMENTS

The following table identifies those actions committed to by WCNOG 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.
WCNOG is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)). The regulatory commitment to provide the operating data that is described in Generic Letter 97-02 will be included in the Technical Requirements Manual.	Within 90 days of NRC approval.