

WOLF CREEK NUCLEAR OPERATING CORPORATION

Stephen E. Hedges
Site Vice President

October 21, 2010

WO 10-0066

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

Reference: Letter dated March 31, 1999, from J. N. Donohew, USNRC, to O. L. Maynard, WCNOG, "Conversion to Improved Technical Specifications for Wolf Creek Generating Station – Amendment No. 123 to Facility Operating License No. NPF-42 (TAC No. M98738)"

Subject: Docket No. 50-482: Correction of Typographical Error in Technical Specification 5.7.2

Gentlemen:

Pursuant to 10 CFR 50.90, Wolf Creek Nuclear Operating Corporation (WCNOG) hereby requests an amendment to Renewed Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS). The proposed amendment corrects a typographical error in Section 5, Administrative Controls, of the Technical Specifications (TS). The typographical error was inadvertently introduced in license amendment No. 123 (Reference).

Attachment I through III provide the Evaluation, Markup of TS, and Revised TS page, 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 impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment.

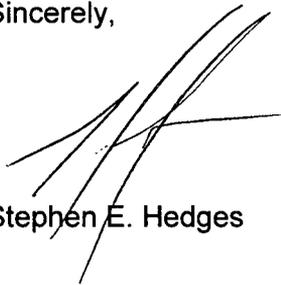
The Plant Safety Review Committee reviewed this amendment application. In accordance with 10 CFR 50.91, a copy of this amendment application, with attachments, is being provided to the designated Kansas State official.

ADD
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WCNOC requests approval of this proposed amendment by October 31, 2011. 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.

This letter contains no new or revised commitment. If you have any questions concerning this matter, please contact me at (620) 364-4190, or Mr. Richard D. Flannigan at (620) 364-4117.

Sincerely,



Stephen E. Hedges

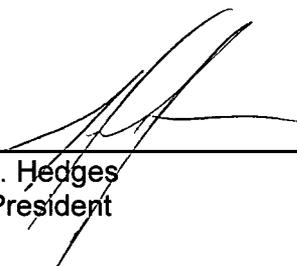
SEH/rt

Attachments: I Evaluation
II Proposed Technical Specification Change (Mark-up)
III Revised Technical Specification Page

cc: E. E. Collins (NRC), w/a
T. A. Conley (KDHE), w/a
G. B. Miller (NRC), w/a
B. K. Singal (NRC), w/a
Senior Resident Inspector (NRC), w/a

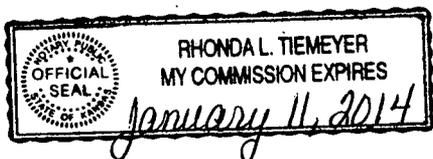
STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Stephen E. Hedges, 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 

Stephen E. Hedges
Site Vice President

SUBSCRIBED and sworn to before me this 21st day of October, 2010.





Notary Public

Expiration Date January 11, 2014

EVALUATION

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
- 3.0 TECHNICAL EVALUATION
- 4.0 REGULATORY EVALUATION
 - 4.1 Applicable Regulatory Requirements/Criteria
 - 4.2 Significant Hazards Consideration
 - 4.3 Conclusion
- 5.0 ENVIRONMENTAL CONSIDERATION
- 6.0 REFERENCES

EVALUATION

1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, Wolf Creek Nuclear Operating Corporation (WCNOC) hereby requests an amendment to Renewed Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS). The proposed amendment corrects a typographical error in Section 5, Administrative Controls, of the Technical Specifications (TS). The typographical error was inadvertently introduced in license amendment No. 123 (Reference 1).

2.0 DETAILED DESCRIPTION

The typographical error in Section 5.0, Administrative Controls, of the plant's TS is being corrected. The error is in the numbering of item 5.7.2d.4 as item 5.7.2d.3. Item 5.7.2d.3 already exists and is numbered correctly.

3.0 TECHNICAL EVALUATION

WCNOC letter ET 97-0050 (Reference 2) submitted a license amendment request for conversion of the current TSs to the improved TSs. This submittal included Section 5.7.2. WCNOC letter ET 98-0078 (Reference 3) provided a response to a staff request for additional information on Section 5.0. The response to Q5.2-1 provided a revised TS Section 5.7.2 that included 5.7.2d.4. With the issuance of Reference 1, a typographical error was introduced in the numbering of Section 5.7.2d.4.

This change is considered administrative since there is no change in the function, operation or physical configuration of the plant.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

- Section 182a of the Atomic Energy Act requires applicants for nuclear power plant operating licenses to include TSs as part of the license. The Commission's regulatory requirements related to the content of the TSs are contained in Title 10, Code of Federal Regulations (10 CFR), Part 50, Section 50.36, "Technical Specifications." The TS requirements in 10 CFR 50.36 include the following categories: (1) safety limits, limiting safety system settings and control settings, (2) limiting conditions for operation, (3) surveillance requirements (SRs), (4) design features, and (5) administrative controls.

The proposed change corrects a typographical error in Section 5, Administrative Controls, of the TS. There is no change to the WCGS design and analysis. Therefore, requirements and the recommendations of these regulations and guidance continue to be met with the proposed change.

4.2 Significant Hazards Consideration

Pursuant to 10 CFR 50.90, Wolf Creek Nuclear Operating Corporation (WCNOC) is requesting an amendment to Renewed Facility Operating License No. NPF-42 for the Wolf Creek

Generating Station (WCGS). This license amendment requests correction of a typographical error in Section 5, Administrative Controls, of the Technical Specifications (TS).

WCNOC has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, Issuance of Amendment:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change is administrative in nature. The change involves correcting a typographical error. This change does not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility. The Limiting Safety System Settings and Safety Limits specified in the TS remain unchanged.

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

2. Does the proposed amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response: No

The proposed change is administrative in nature. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected. Consequently no new failure modes are introduced as a result of the proposed change.

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

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change is administrative in nature. Since there is no changes to the operation of the facility or the physical design, the Updated Safety Analysis Report (USAR) design basis, accident assumptions, or TS Bases are not affected.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

4.3 Conclusion

Based on the above discussions, it has been determined that the requested TS revision does not involve a significant increase in the probability of consequences of an accident or other adverse conditions over previous evaluations; or create the possibility of a new or different kind of accident or condition over previous evaluations; or involve a significant reduction in a margin

of safety. Therefore, the requested license amendment does not involve a significant hazards consideration.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to 10 CFR 51.22(c)(10)(v), changes to the format of the license or permit or otherwise makes editorial, corrective or other minor revisions. 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.

6.0 REFERENCES

1. Letter from J. N. Donohew, USNRC, to O. L. Maynard, WCNOC, "Conversion to Improved Technical Specifications for Wolf Creek Generating Station – Amendment No. 123 to Facility Operating License No. NPF-42 (TAC No. M98738)," (Agencywide Documents Access and Management System Accession No. ML022050061), March 31, 1999.
2. WCNOC letter ET 97-0050, "Technical Specification Conversion Application," May 15, 1997.
3. WCNOC letter ET 98-0078, "Response to Request for Additional Information on the Proposed Conversion to the Improved Standard Technical Specifications, Section 3.4 and 5.0," September 24, 1998.

Proposed Technical Specification Change (Mark-up)

5.7 High Radiation Area

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

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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.

(continued)

Revised Technical Specification Page

5.7 High Radiation Area

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
 - 4. 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.

(continued)