

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan
Vice President Nuclear Assurance

April 19, 1994

NA 94-0063

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Subject: Docket No. 50-482: Revision to Technical Specification
Section 6.2 - Organization

Gentlemen:

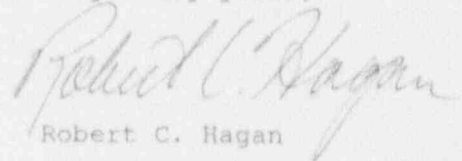
This letter is to transmit an application for amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station (WCGS), Unit No. 1. This license amendment request proposes revising Technical Specification Section 6.2.2.g to reflect a title designation change within the Wolf Creek Nuclear Operating Corporation (WCNOC) organization.

Attachment I provides a description of the proposed change along with a Safety Evaluation. Attachment II provides a No. Significant Hazards Consideration Determination. Attachment III provides the Environmental Impact Determination. The specific change to the technical specifications proposed by this request is provided as Attachment IV.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Kansas State Official.

If you have any questions concerning this matter, please contact me at (316) 364-8831 extension 4553 or Mr. Kevin J. Moles at extension 4565.

Very truly yours,


Robert C. Hagan

RCH/jra

Attachments: I - Safety Evaluation
II - No Significant Hazards Consideration Determination
III - Environmental Impact Determination
IV - Proposed Technical Specification Change

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STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Robert C. Hagan, of lawful age, being first duly sworn upon oath says that he is Vice President Nuclear Assurance of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the content thereof; that he has executed that 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 Robert C. Hagan
Robert C. Hagan
Vice President
Nuclear Assurance

SUBSCRIBED and sworn to before me this 19 day of April, 1994.

David Elliott
Notary Public

Expiration Date 5/19/95

Attachment I to NA 94-0063
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ATTACHMENT I
SAFETY EVALUATION

Safety Evaluation

Proposed Change

This amendment request proposes to revise Technical Specification Section 6.2.2.g to reflect a title designation change in the Wolf Creek Nuclear Operating Corporation (WCNOC) organization.

Evaluation

The title of Supervisor Operations in Technical Specification Section 6.2.2.g is being changed to Assistant Manager Operations. This title change is administrative in nature and does not represent any change in reporting relationships, job responsibilities, or overall organizational commitments.

Regulation 10 CFR 50.54(1) states:

"The licensee shall designate individuals to be responsible for directing the licensed activities of licensed operators. These individuals shall be licensed as senior operators pursuant to part 55 of this chapter."

This regulation implies that the Shift Supervisors are required to report to an individual licensed as a senior reactor operator (SRO). At WCNOC, the Shift Supervisors report to the Supervisor Operations who holds a SRO license. The Shift Supervisors will continue to report to the Assistant Manager Operations.

Based on the above discussions and the considerations presented in Attachment II, the proposed change does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report; or create a possibility for an accident or malfunction of a different type that are previously evaluated in the safety analysis report; or reduce the margin of safety as defined in the basis for any technical specification. Therefore, the proposed change does not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

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ATTACHEM

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

No Significant Hazards Consideration Determination

The proposed change would revise Technical Specification Section 6.2.2.g to reflect a title designation change in the Wolf Creek Nuclear Operating Corporation (WCNOC) organization.

Standard I - Involves a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. This change involves an administrative change to the WCNOC organization and to the position title and as such has no effect on plant equipment or the technical qualification of plant personnel.

Standard II - Create the Possibility of a New or Different Kind of Accident from any Previously Evaluated

The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This change is administrative in nature and does not involve any change to the installed plant systems or the overall operating philosophy of Wolf Creek Generating Station.

Standard III - Involve a Significant Reduction in the Margin of Safety

The proposed change does not involve a significant reduction in a margin of safety. This change does not involve any changes in overall organizational commitments. A position title change alone does not reduce any margin of safety.

Based on the above discussions it has been determined that the requested technical specification revision does not involve a significant increase in the probability or consequences of an accident or other adverse condition over previous evaluations; or create the possibility of a new or different kind of accident or condition over previous evaluation; or involve a significant reduction in a margin of safety. The requested license amendment does not involve a significant hazards consideration.

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ATTACHMENT III
ENVIRONMENTAL IMPACT DETERMINATION

Environmental Impact Determination

10 CFR 51.22(b) specifies the criteria for categorical exclusions from the requirements for a specific environmental assessment per 10 CFR 51.21. This amendment request meets the criteria specified in 10 CFR 51.22(c)(9). The specific criteria contained in this section are discussed below.

- (i) the amendment involves no significant hazards consideration

As demonstrated in the No Significant Hazards Consideration Determination in Attachment II, the requested license amendment does not involve any significant hazards consideration.

- (ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite

The requested license amendment involve no change to the facility and does not involve any change in the manner of operation of any plant systems involving the generation, collection or processing of radioactive materials or other types of effluents. Therefore, no increase in the amounts of effluents or new types of effluents would be created.

- (iii) there is no significant increase in individual or cumulative occupational radiation exposure

The requested license amendment involves no change to the facility and does not involve any change in the manner of operation of any plant systems involving the generation, collection or processing of radioactive materials or other types of effluents. Furthermore, implementation of this proposed change will not involve work activities which could contribute to occupational radiation exposure. Therefore, there will be no increase in individual or cumulative occupational radiation exposure associated with this proposed change.

Based on the above it is concluded that there will be no impact on the environment resulting from this change. The change meets the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.21 relative to specific environmental assessment by the Commission.

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ATTACHMENT IV
PROPOSED TECHNICAL SPECIFICATION CHANGES