

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Forrest T. Rhodes
Vice President
Engineering & Technical Services

March 8, 1991
ET 91-0053

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

Reference: Letter ET 91-0047 dated February 27, 1991 from F. T. Rhodes, WCNOG to the NRC
Subject: Docket No. 50-482: Changes to Proposed Revision to Technical Specifications 3/4.3.1 and 3/4.3.2 - Increased Surveillance Test Intervals and Allowed Outage Times for Reactor Trip System and Engineered Safety Features Actuation System Instrumentation

Gentlemen:

In Reference 1 Wolf Creek Nuclear Operating Corporation (WCNOG) submitted proposed Technical Specification changes to Sections 3/4.3.1 and 3/4.3.2. As discussed between Mr. D. V. Pickett, NRC and Mr. H. K. Chernoff, WCNOG on March 5, 1991, additional information is being provided concerning ESFAS instrument setpoint drift. Additionally, this letter transmits revised marked-up pages for the Technical Specifications.

Revisions to the enclosed pages are identified with a revision bar. The enclosed pages should be inserted into Reference 1.

In accordance with 10 CFR 50.91, a copy of the revised pages is being provided to the designated Kansas State Official. If you have any question concerning this matter, please contact me or Mr. H. K. Chernoff of my staff.

Very truly yours,



Forrest T. Rhodes
Vice President
Engineering & Technical Services

FTR/sgw

Enclosures

cc: G. W. Allen (KDHE), w/e
A. T. Howell (NRC), w/e
R. D. Martin (NRC), w/e
D. V. Pickett (NRC), w/e
M. E. Skow (NRC), w/e

9103120293 910308
PDR ADDOCK 05000482
PDR

P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 354-8831
An Equal Opportunity Employer M/F/H/VET

A001
1/1

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Forrest T. Rhodes, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering and Technical Services 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 Forrest T. Rhodes
Forrest T. Rhodes
Vice President
Engineering & Technical Services

SUBSCRIBED and sworn to before me this 8 day of March, 1991.

Marlene Heathman
Notary Public

Expiration Date August 4, 1994



A review was performed on the impact of extending the AOTs for those SSPS functions (i.e., steam generator level low-low, phase A containment isolation, safety injection, and SSPS logic) which provide input to plant-specific design features such as BOP ESFAS. Implementation of the following plant-specific functions is affected by any change in signal availability to or from the BOP ESFAS:

- (a) containment purge isolation (Functional Unit 3.c)
- (b) auxiliary feedwater initiation (Functional Unit 6.d)
- (c) control room ventilation isolation (Functional Unit 9)

No changes are proposed to the technical specification requirements for the BOP ESFA actuation logic and relays (i.e., no changes are proposed for Functional Units 3.c.3), 6.c, or 9.c) and the unavailability of the BOP ESFAS itself remains unchanged. For the above functions (a) through (c), overall function unavailability is made up of two separate components representing SSPS unavailability and BOP ESFAS unavailability, the latter remaining unchanged. As reported in Tables 3.6-6 and 3.6-9 of WCAP-10271, Supplement 2, Revision 1, typical unavailability for safety injection and auxiliary feedwater pump start increased by a factor of 3 to 6. Given that the BOP ESFAS unavailability does not change, the overall functional unavailability increase would be bounded by the factor of 3 to 6 increase in SSPS unavailability, regardless of what value is assigned to the BOP ESFAS unavailability (typical value is $5E-04$). Similar conclusions can also be drawn for Functional Units 4 and 5 which are implemented via the Main Steam/Main Feedwater Isolation Actuation System.

Therefore, the overall impact of the changes in SSPS unavailability resulting from the generic technical specification changes on the affected plant-specific ESFAS functions remains within the bounds of the generic analysis.

- b. SER Condition - Confirm that any increase in instrument drift due to the extended STIs is properly accounted for in the setpoint calculation methodology.

Response - From the monthly ACOTs performed on the ESFAS instrumentation, WCNOG collects the "as found" and "as left" data including accumulated drift for trending of calibration/setpoint drift. A review of this data confirmed that the setpoint drift which could be expected under the extended STIs remains within the existing allowance in the ESFAS instrument setpoint calculation. To support this conclusion, "as found" and "as left" data for those ESFAS channels with increased STIs will be collected over a one year period after quarterly testing is begun. WCNOG will review this data to verify that any setpoint drift remains within the existing allowance in the ESFAS instrument setpoint calculation.

Standard 2 - Create the Possibility of a New or Different Kind of Accident from any Previously Analyzed.

The proposed changes do not involve hardware changes and do not result in a change in the manner in which the RTS or ESFAS provide plant protection. No change is being made which alters the functioning of the RTS or ESFAS. Rather the likelihood or probability of the RTS or ESFAS functioning properly is affected as described above. Therefore the proposed changes do not create the possibility of a new or different kind of accident.

Standard 3 - Involve a Significant Reduction in a Margin of Safety.

The proposed changes do not alter the manner in which safety limits, limiting safety system settings, or limiting conditions for operation are determined. The impact of reduced testing, other than as addressed above, is to allow a longer time interval over which instrument uncertainties (e.g., drift) may act. The review of existing monthly calibration/setpoint drift data for ESFAS instrumentation addresses this concern. Implementation of the proposed changes is expected to result in an overall improvement in safety, as follows:

- a. Reduced testing will result in fewer inadvertent reactor trips, less frequent actuation of ESFAS components, and less frequent distraction of operations personnel.
- b. Improvements in the effectiveness of the operating staff in monitoring and controlling plant operation will be realized. This is due to less frequent distraction of the operators and shift supervisor to attend to instrumentation testing.
- c. Longer repair times associated with increased AOTs will lead to higher quality repairs and improved reliability.

Based on the above discussions, it has been determined that the proposed technical specification revisions do not involve a significant increase in the probability or consequences of an accident previously evaluated; or create the possibility of a new or different kind of accident; or involve a significant reduction in a margin of safety. Therefore, this amendment application does not involve a significant hazards consideration.