

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Richard N. Johannes  
Chief Administrative Officer

July 22, 1994

CO 94-0003

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

Reference: Letter NA 94-0063 dated April 19, 1994 to USNRC from  
R. C. Hagan, WCNOG  
Subject: Docket No. 50-482: Revision to Technical Specification  
Section 6.0 - 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 letter supercedes letter NA 94-0063 referenced above. This license amendment request proposes revising Technical Specification Section 6.0 to reflect position title changes within the Wolf Creek Nuclear Operating Corporation (WCNOG) organization.

Attachment I provides a Safety Evaluation along with a detailed description of the proposed changes. Attachment II provides a Significant Hazards Consideration Determination. Attachment III provides a Environmental Impact Determination. The specific changes to Technical Specifications proposed by this request are provided as Attachment IV.

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P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-8831

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ADD 1/1

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 4001 or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,

  
Richard N. Johannes

RNJ/jra

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

cc: G. W. Allen (KDHE), w/a  
     M. A. Miller (NRC), w/a  
     L. J. Callan (NRC), w/a  
     G. A. Pick (NRC), w/a  
     W. D. Reckley (NRC), w/a

STATE OF KANSAS     )  
                          )  SS  
COUNTY OF COFFEY    )

Richard N. Johannes, of lawful age, being first duly sworn upon oath says that he is Chief Administrative Officer 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 Richard N. Johannes  
Richard N. Johannes  
Chief Administrative Officer

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

Melinda V. Wilkerson  
Notary Public

Expiration Date 7/26/97

Attachment I  
Safety Evaluation

## Safety Evaluation

### Proposed Change

This amendment request proposes to revise Technical Specification Section 6.2.2.g, 6.3.1.b, and 6.12.1.c to reflect title changes in the Wolf Creek Nuclear Operating Corporation (WCNOC) organization.

### Evaluation

The title of Supervisor Operations in Technical Specification 6.2.2.g is being changed to Superintendent 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 Superintendent Operations.

The title of Radiation Protection Manager in Technical Specification 6.3.1.b is being changed to Superintendent Radiation Protection and language has been added to assure the qualifications for this position continue to meet or exceed the requirements for Radiation Protection Manager as described in Regulatory Guide 1.8. The title of Manager Radiation Protection in Technical Specification 6.12.1.c is being changed to Superintendent Radiation Protection. The titles of Radiation Protection Manager and Manager Radiation Protection are identical in duties and responsibilities and are the same position. This title change incorporates both titles into the title of Superintendent Radiation Protection. This title change is administrative in nature and does not represent any change in reporting relationships, job responsibilities, or overall organizational changes.

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 a different type than any previously evaluated in the safety analysis report; or reduce the margin of safety as defined in 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.

Attachment II

No Significant Hazards Consideration Determination

**No Significant Hazards Consideration Determination**

The proposed change would revise Technical Specification 6.2.2.g, 6.3.1.b, and 6.12.1.c to reflect title designation changes 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 changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. These changes involve administrative changes to the WCNOC organization and to the position titles and as such have 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 the 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 involve a significant reduction in the margin of safety.

Attachment III to CO 94-0003  
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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 51.22 (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 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. 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 discussion 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.