

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan
Vice President Engineering

June 14, 1995

ET 95-0051

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 Specifications
to Implement Cycle 9 Nuclear and Core Thermal-Hydraulic
Design Methodologies

Gentlemen:

This letter transmits an application for amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station (WCGS). This license amendment request proposes revising Technical Specification 3.2.2, "Heat Flux Hot Channel Factor," Technical Specification 3.2.3, "Nuclear Enthalpy Rise Hot Channel Factor," Technical Specification 6.9.1.9, "Core Operating Limits Report," and associated Bases sections. The revisions are needed to incorporate changes associated with the planned implementation of advanced nuclear and core thermal-hydraulic design methodologies licensed from Westinghouse Electric Corporation for the Cycle 9 reload design.

Attachment I provides a detailed safety evaluation/analysis including a description of the proposed changes. Attachment I contains confidential commercial information which Westinghouse considers to be proprietary information. This information is marked in brackets throughout Attachment I. In accordance with the provisions of 10 CFR 2.790, it is respectfully requested that all bracketed information in Attachment I be regarded as proprietary information, and withheld from public disclosure. Attached are Affidavits from WCNO and Westinghouse which set forth the basis by which this information should be withheld from public disclosure by the Commission and addressees.

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

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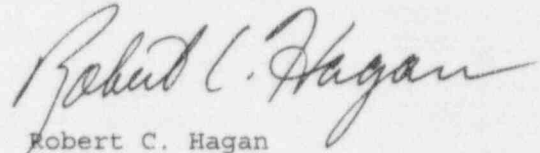
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Attachment II provides a No Significant Hazards Consideration Determination and Attachment III provides an Environmental Impact Determination. Marked-up pages indicating the specific changes to the technical specifications proposed by this request are provided in Attachment IV. Attachment V provides draft corrected technical specification pages with the requested changes incorporated.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Kansas State official. WCNOG requests NRC review of the proposed changes be completed prior to the start of the eighth refueling outage, which is scheduled to begin in March 1996.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4553, or Mr. Richard D. Flannigan, at extension 4500.

Very truly yours,



Robert C. Hagan

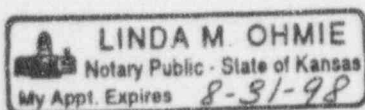
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Attachments I. - Safety Evaluation
II. - No Significant Hazards Consideration Determination
III. - Environmental Impact Determination
IV. - Proposed Technical Specification Change (Marked-up Pages)
V. - Proposed Technical Specification Change (Typed Pages)

cc: G. W. Allen (KDHE), w/a
L. J. Callan (NRC), w/a
K. F. Kirsch (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

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 Engineering 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
Engineering

SUBSCRIBED and sworn to before me this 14th day of June, 1995.

Linda M. Ohmie
Notary Public

Expiration Date 8-31-98

- (c) Its use by another company would reduce its expenditure of resources or improve its competitive position in the design, assurance of quality, or licensing a similar product.

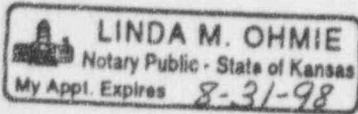
There are sound reasons behind the WCNOG position which include the following:

- (a) It is information which is marketable in many ways.
 - (b) Use by other companies would put WCNOG at a competitive disadvantage by reducing their expenditure of resources at our expense.
 - (c) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving WCNOG of a competitive advantage.
- (ii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.790, it is to be received in confidence by the Commission.
 - (iii) The information sought to be protected is not available in public sources to the best of our knowledge and belief.
 - (iv) The proprietary information sought to be withheld in this submittal is that which is marked by brackets in the Safety Evaluation attached to the "Revision to Wolf Creek Generating Station Technical Specifications to Implement Cycle 9 Nuclear and Core Thermal-Hydraulic Design Methodologies," WCNOG Letter ET 95-0051, submitted to the Document Control Desk in June, 1995, along with this Affidavit.

The subject information could only be duplicated by competitors if they were to invest time and effort equivalent to that invested by WCNOG, provided they have the requisite talent and experience

Public disclosure of this information is likely to cause substantial harm to the competitive position of WCNOG because it would simplify design and evaluation tasks without requiring a commensurate investment of time and effort.

(5) The above statements are true and correct to the best of my knowledge, information and belief.



Robert C. Hagan
Robert C. Hagan
Vice President
Engineering

SUBSCRIBED and sworn to before me this 14th day of June, 1995.

Linda M. Ohmie
Notary Public

My Commission Expires 8-31-98

ATTACHMENT II

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

No Significant Hazards Consideration Determination

This license amendment request proposes revising Technical Specification 3.2.2, "Heat Flux Hot Channel Factor," Technical Specification 3.2.3, "Nuclear Enthalpy Rise Hot Channel Factor," Technical Specification 6.9.1.9, "Core Operating Limits Report," and associated Bases sections. The revisions are needed to incorporate changes associated with the planned implementation of advanced nuclear and core thermal-hydraulic design methodologies licensed from Westinghouse Electric Corporation for core reload design, starting with Cycle 9.

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

The probability of occurrence and the consequences of an accident evaluated previously in the Updated Safety Analysis Report (USAR) are not increased due to the proposed technical specification changes. The Technical Specification changes being requested are to reflect revised calculational methods to be used for core reload design, starting with Cycle 9. There are no changes being made to any licensed design parameters from previous cycles. Thus, it is concluded that the probability and consequences of the accidents previously evaluated in the USAR are not increased.

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

There is no new type of accident or malfunction being created. The proposed changes only provide revised analysis methodologies to support core reload design, starting with Cycle 9. The requested changes do not change the method and manner of plant operation. The safety design bases in the USAR have not been altered. Thus, the requested changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed changes do not change the plant configuration in a way that introduces a new potential hazard to the plant and do not involve a significant reduction in the margin of safety. The analyses and evaluations discussed in the safety evaluation (Attachment I) demonstrate that all applicable design criteria continue to be met for the changes. Therefore, it is concluded that the margin of safety, as described in the bases to any technical specification, is not reduced.

Based on the above discussions, it has been determined that the requested technical specification changes do 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 evaluations; or involve a significant reduction in a margin of safety. Therefore, the requested license amendment does not involve a significant hazards consideration.

Attachment III to ET 95-0051
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ATTACHMENT III
ENVIRONMENTAL IMPACT DETERMINATION

Environmental Impact Determination

This amendment request meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) as specified below:

- (i) the amendment involves no significant hazards consideration

As demonstrated in Attachment II, the proposed amendment request 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 proposed amendment request does not involve a change to the facility or operating procedures which would cause an increase in the amounts of effluents or create new types of effluents. The proposed changes only provide revised analysis methodologies, do not change any licensed design parameters from previous cycles, and do not reduce the margin of safety to any licensed design parameter.

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

The proposed amendment request would not adversely affect the operation of the reactor, and would not affect any system that would affect occupational radiation exposure. The proposed changes do not create additional exposure to personnel nor affect levels of radiation present. The proposed changes will not result in any increase in individual or cumulative occupational radiation exposure.

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