

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan  
Vice President Engineering

August 22, 1995

ET 95-0052

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 Relocate Instrumentation Response Time Limits

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 relocating Technical Specification (TS) Tables 3.3-2, "Reactor Trip System Instrumentation Response Times," and 3.3-5, "Engineered Safety Features Response Times," and associated Bases sections, to the Wolf Creek Updated Safety Analysis Report (USAR), Chapter 16. The NRC has already implemented this line-item TS improvement in the new Standard Technical Specifications (NUREG-1431 for Westinghouse plants). This application was developed from the guidance provided by the NRC in Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993.

Attachment I provides a detailed Safety Evaluation/analysis including a description of the proposed changes. 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.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Kansas State official. This proposed revision to the WCGS Technical Specifications will be fully implemented within 60 days following formal NRC approval.

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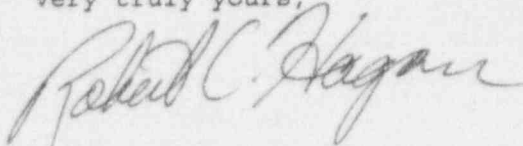
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If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4553, or Mr. Richard D. Flannigan, at extension 4500.

Very truly yours,



Robert C. Hagan

RCH/jra

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

cc: G. W. Allen (KDHE), w/a  
L. J. Callan (NRC), w/a  
D. 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 22nd day of August, 1995.

Angela E. Wessel  
Notary Public

Expiration Date July 3, 1999

ATTACHMENT I  
SAFETY EVALUATION

## Safety Evaluation

### Proposed Change

This license amendment request proposes to relocate Wolf Creek Generating Station (WCGS) Technical Specification Tables 3.3-2, "Reactor Trip System Instrumentation Response Times," and 3.3-5, "Engineered Safety Features Response Times," and applicable Bases discussions to Chapter 16 of the Updated Safety Analysis Report (USAR). This is a line-item improvement that the NRC has already implemented in the new Standard Technical Specification (NUREG-1431 for Westinghouse plants). This application was developed from the guidance provided by the NRC in Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993.

### Background

The periodic measurement of response times provides assurance that the reactor trip and ESF actuation associated with a specific analog channel is completed within the time limit assumed in the safety analyses. A listing of assumed response times is given in USAR Table 15.0-4.

The limiting conditions for operation (LCOs) for Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) instruments currently require that these systems be operable with response times as specified in the technical specification tables for each of these systems. The surveillance requirements specify that each of these systems be tested and that the response time of each function be verified to be within its limits. Relocating the RTS and ESFAS instrument response time limit tables from the technical specifications to the USAR will not alter these surveillance requirements. The USAR will now address the response time limits for the RTS and ESFAS instruments, including those channels for which the response time limit is indicated as not applicable. The USAR will also clarify response time limits where footnotes are included in the tables that describe how those limits are applied. This technical specification change will allow administrative control of changes to the response time limits for the RTS and ESFAS instruments in accordance with the provisions of 10 CFR 50.59 without the need to process a license amendment request.

### Evaluation

The proposed change does not:

- 1) Involve an increase in the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR.

This amendment request does not change any RTS or ESFAS instrument response times or surveillance intervals currently prescribed in Technical Specification Tables 3.3-2 and 3.3-5. The RTS and ESFAS will continue to function in a manner consistent with the assumptions in the USAR Chapter 15 accident analyses and the plant design basis. Therefore, overall protection

system performance will remain within the bounds of the accident analyses documented in USAR Chapter 15. As such, there will be no degradation in system performance, nor will there be an increase in the number of challenges to equipment assumed to function during an accident situation.

The proposed technical specification revision does not involve any hardware changes, instrumentation setpoints, system operating parameters, or system accident mitigation capabilities, nor do they affect the probability of any event initiators. Thus, the proposed change will not result in an increase in the consequences of or the probability of occurrence of any accident or safety-related equipment malfunction.

- 2) Create the possibility for an accident or malfunction of a different type than any previously evaluated in the USAR.

The proposed technical specification changes do not involve any design changes, nor are there any changes in the method by which any safety-related plant system performs its safety function. The normal manner of plant operation is not affected by this proposed change.

No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result of the proposed change. There will be no adverse effect or challenges imposed on any safety-related system as a result of these changes. Therefore, the possibility of a new or different kind of accident is not created by the proposed change.

The proposed technical specification change will not result in any changes that would cause the malfunction of any safety-related equipment assumed to be operable in the accident analysis. No new mode of failure will be created, and no new equipment performance burdens will be imposed by the proposed change. Therefore, this proposed amendment will not create the possibility of a new or different malfunction of safety-related equipment.

Plant procedures for response time testing include acceptance criteria that reflect the limits in the technical specification tables being relocated to the USAR. Following approval of this amendment request, a USAR Change Request will be prepared to reflect the limits currently contained in Technical Specification Tables 3.3-2 and 3.3-5. Thereafter, these tables, and any changes thereto, will be reflected in the USAR and updated, as required by 10 CFR 50.71(e). Future changes to these limits will then be controlled per the requirements of 10 CFR 50.59.

- 3) Involve a reduction in the margin of safety as defined in the basis for any technical specification.

No response times will be changed by this amendment request. The proposed request only changes the document where the response times will be listed. Once the response times are relocated to the USAR, future changes to the response time values will be processed under 10 CFR 50.59. The proposed amendment request will not affect the manner in which safety limits or limiting safety system settings are determined, nor will there be any effect of those plant systems necessary to assure the accomplishment of protection functions. The proposed amendment request will not impact any margin of safety defined in the basis for any technical specification.

Based on the information presented above, the proposed amendment does not involve an unreviewed safety question and will not adversely affect or endanger the health or safety of the general public.

ATTACHMENT II

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION



**No Significant Hazards Consideration Determination**

This proposed license amendment request would relocate Technical Specification Tables 3.3-2, "Reactor Trip System Instrumentation Response Times," and 3.3-5, "Engineered Safety Features Response Times," and applicable Bases discussions, to Updated Safety Analysis Report (USAR) Chapter 16. The NRC has already implemented this line-item technical specification improvement in the new Standard Technical Specifications (NUREG-1431 for Westinghouse plants). This amendment request follows the guidance provided by the NRC in Generic Letter 93-08 for relocating instrument response time tables.

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

This license amendment request does not change any Reactor Trip System (RTS) or Engineered Safety Features Actuation System (ESFAS) instrument response times or surveillance intervals currently prescribed in Technical Specification Tables 3.3-2 and 3.3-5. The RTS and ESFAS will continue to function in a manner consistent with the assumptions in the Updated Safety Analysis Report Chapter 15 accident analyses and the plant design basis. Therefore, overall protection system performance will remain within the bounds of the accident analyses documented in USAR Chapter 15. As such, there will be no degradation in system performance, nor will there be an increase in the number of challenges to equipment assumed to function during an accident situation.

The proposed technical specification revision does not involve any hardware changes or changes to any instrumentation setpoints, system operating parameters, or system accident mitigation capabilities, nor do the changes affect the probability of any event initiators. Thus, the proposed change will not result in an increase in the consequences of or the probability of occurrence of any accident or safety-related equipment malfunction.

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

As discussed above, there are no hardware changes associated with this proposed amendment request, nor are there any changes in the method by which any safety-related plant system performs its safety function. The normal manner of plant operation is not affected by this proposed change.

No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result of the proposed changes. There will be no adverse effect or challenges imposed on any safety-related system as a result of these changes. Therefore, the possibility of a new or different kind of accident is not created by the proposed changes.

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

No response times will be changed by this amendment request. The proposed request only changes the document where the response times will be listed. This proposed amendment request will not affect the manner in which safety limits or limiting safety system settings are determined, nor will there be any effect on plant systems necessary to assure the accomplishment of protection functions. The proposed change will not impact any margin of safety defined in the basis for any Technical Specification.

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; create the possibility of a new or different kind of accident or condition over previous evaluations; nor involve a significant reduction in a margin of safety. Therefore, the requested license amendment meets the requirements of 10 CFR 50.92(C), and does not involve a significant hazards consideration.

ATTACHMENT III  
ENVIRONMENTAL IMPACT DETERMINATION

**Environmental Impact Determination**

This license 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 change 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 changes do not involve a change to the facility or operating procedures that would cause an increase in the amounts of effluents or create new types of effluents. The proposed changes only relocate instrument response time tables from the technical specifications to the Updated Safety Analysis Report. The proposed technical specification revision does not involve any hardware changes or changes to any instrumentation setpoints, system operating parameters, or system accident mitigation capabilities, nor do the changes affect the probability of any event initiators. Thus, the proposed changes 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 changes would not adversely affect the operation of the reactor, and would not affect any system that would affect occupational radiation exposure. The proposed change does not create additional exposure to personnel nor affect levels of radiation present. The proposed change 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 change, and that the proposed change 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.

ATTACHMENT IV  
PROPOSED TECHNICAL SPECIFICATION CHANGES