KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

June 28, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

KMLNRC 84-102
Re: Docket No. STN 50-482
Ref: 1) Letter KMLNRC 84-091 dated June 18, 1984 from GLKoester, KG&E, to HRDenton, NRC
2) Letter KLNRC-022 dated February 19, 1980 from GLKoester, KG&E, to HRDenton, NRC
Subj: Revision to Operating License Application

Dear Mr. Denton:

This letter supersedes Reference 1), which should be discarded.

The Reference 2) letter transmitted an Amendment to Kansas Gas and Electric Company's application for an Operating License for the Wolf Creek Generating Station, Unit No. 1 (WCGS). Attached is a revision to the Application requesting that the term of the Operating License for the Wolf Creek Generating Station be forty years, commencing from the date of issuance of the Operating License, rather than the date of the Construction Permit. The organization structures described in the Application have changed slightly, but have not been updated.

KG&E finds that no significant adverse environmental impact is anticipated as a result of increasing the operating life of the Wolf Creek Generating Station to forty years. This conclusion is justified for the following reasons:

1) The Wolf Creek Generating Station is located in a rural area where the population growth over the forty-year lifetime is expected to be small.

2) Having the WCGS available for a forty-year term would maintain system capacity, promote fuel diversification and defer capital costs and environmental impacts of replacement capacity.

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3) Environmental considerations associated with a forty-year operating period do not change significantly. As characterized by the NRC Staff in the WCGS Final Environmental Statement (NUREG-0878), operational impacts to the aquatic and terrestrial ecosystems from operation of the various plant processes are small. Additionally, extension of these minimal environmental impacts would be largely offset by elimination of impacts associated with the acquisition of replacement capacity.

4) A forty-year operating lifetime would extend the socioeconomic benefits from operation of the plant. The creation of direct and indirect jobs and sustained tax benefits would continue to outweigh the small adverse impacts from land use and the continued demand for community services. Accident risks, human health effect and impacts for the balance of the fuel cycle will continue to be low.

The magnitude of the plant impact is not expected to vary significantly over the extended lifetime of forty years. The WCGS plant was designed for a forty-year life and its operation over this period of time is not expected to compromise any safety limits or design parameters.

Yours very truly,

Glenn L Koester

Glenn L. Koester
Vice President - Nuclear

GLK:bb
Attach

xc: JCollins, Region IV
PO'Connor
HBundy