

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Forrest T. Rhodes
Vice President
Engineering & Technical Services

June 11, 1992

ET 92-0120

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

Reference: Letter dated December 12, 1991, from J. A. Bailey,
WCNOC to the U. S. Nuclear Regulatory Commission
Subject: Docket No. 50-482: Revision to Technical Specification
Section 4.8 - Electrical Power Systems

Gentlemen:

The purpose of this letter is to transmit an application for amendment to Facility Operating License No. NPP-42 for Wolf Creek Generating Station (WCGS), Unit No. 1. This license amendment request proposes revising Technical Specification Section 4.8.1.1.2.g(2) to delete the numerical value for the load rejection for the emergency diesel generators as indicated in the Reference.

Attachment I provides a description of the amendment along with a Safety Evaluation. Attachment II provides the Significant Hazards Consideration Determination. Attachment III provides the Environmental Impact Determination. The proposed changes to the technical specifications is provided as 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.

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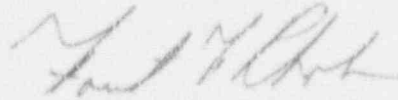
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ADDOK

If you have any questions concerning this matter, please contact me or Mr. S. G. Wideman of my staff.

Very truly yours,



Forrest T. Rhodes
Vice President
Engineering & Technical Services

FTR/mes

Attachments: I - Safety Evaluation
II - Significant Hazards Consideration Determination
III - Environmental Impact Determination
IV - Proposed Technical Specification Change

cc: G. W. Allen (KDHE), w/a
A. T. Howell (NRC), w/a
R. D. Martin (NRC), w/a
G. A. Pick (NRC), w/a
W. D. Reckley (NRC), w/a

STATE OF MISSISSIPPI)
) 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 11 day of June, 1992.

Marilyn Neachner
Notary Public

Expiration Date 8-4-94



ATTACHMENT I

SAFETY EVALUATION

Safety Evaluation

Proposed Change

The purpose of the proposed Technical Specification change is to revise Section 4.8 to remove the numerical value of 1352 kW from the 18 month surveillance requirement in 4.8.1.1.2.g(2). This surveillance requirement ensures the ability of the emergency diesel generators (EDG) to sustain the required voltage and frequency while rejecting the largest single load, the Essential Service Water (ESW) pump motor, during accident conditions. In meeting the criteria of Regulatory Guide 1.9, Revision 1, Position C.5 and Regulatory Guide 1.108, Revision 1, Position C.2.a.(4), a numerical value for the largest single load does not need to be specified.

This proposed Technical Specification change is in response to LER 91-022-00. On November 12, 1991, the Control Room was informed that the requirements of Technical Specification 4.8.1.1.2.g(2) relevant to the 1352 kW could not be satisfied for EDG "B" since the ESW pump motor load is less than the 1352 kW under Loss of Coolant Accident conditions. It was subsequently determined that the requirements for EDG "A" had also not been satisfied. Concerns about the fulfillment of these requirements were raised on November 10, 1991, while investigating a method to preclude water hammering in the ESW system. On November 13, 1991, EDGs "A" and "B" were declared inoperable when it was determined that past performances of the surveillance may not have satisfied the 1352 kW load rejection criterion. EDG "B" was declared operable on November 13, 1991, after the surveillance was performed with the ESW in a lineup which resulted in a load of 1356 kW. EDG "A" was declared operable on November 15, 1991, using the same method. This proposed Technical Specification change will clarify the intent of the Technical Specification.

Evaluation

- 1) Position C.5 of Regulatory Guide 1.9, Revision 1, states that during recovery from transients caused by disconnection of the largest single load, the speed of the diesel generator unit should not exceed the nominal speed plus 75 percent of the difference between nominal speed and the overspeed trip setpoint or 115 percent of nominal whichever is lower. The numerical value for the largest single load (for Wolf Creek Generating Station this is the Essential Service Water (ESW) pump motors) is not needed to comply with this requirement and was conservatively generated during the time when the diesel generators were being selected. The actual load for the ESW pump motors is less than the 1352 kW load listed in the Technical Specifications. As discussed in Regulatory Guide 1.9, after the operating license stage of review the consideration of a somewhat less conservative approach is permitted, such as operation with safety loads within the short-time rating of the diesel generator unit.

Since no new design requirements are being imposed and the change only clarifies how Wolf Creek Nuclear Operating Corporation complies with Regulatory Guide 1.9, Revision 1, there will be no increase in the probability of any accident or equipment malfunction, and there will be no increase in the consequences of an accident or equipment malfunction.

- 2) As stated above, the proposed change does not involve any design changes, hardware modifications, or change to the intended manner of plant operation. Thus this proposed change does not create the possibility for an accident or malfunction of a different type than any previously evaluated in the Updated Safety Analysis Report (USAR).
- 3) The Bases for Technical Specification 3/4.8.1 refer to Regulatory Guides 1.9 and 1.108 with regard to surveillance requirements. The requirements to test for the loss of the single largest load will continue to be satisfied given the approval of this amendment request. No safety limits or limiting safety system settings are being changed. Therefore, this proposed change does not involve a reduction in the margin of safety as defined in the Bases for 3/4.9.1

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

ATTACHMENT II

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Significant Hazards Consideration Determination

The proposed change would revise Technical Specification 4.8.1.1.2.g(2) to delete the numerical load for the load rejection for the emergency diesel generators, while continuing to meet the requirements of Regulatory Guides 1.9 and 1.108. The numerical load was a conservative estimate used in selecting a diesel generator.

Standard 1 - Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated

Position C.5 of Regulatory Guide 1.9, Revision 1, states that during recovery from transients caused by disconnection of the largest single load, the speed of the diesel generator unit should not exceed the nominal speed plus 75 percent of the difference between nominal speed and the overspeed trip setpoint or 115 percent of nominal whichever is lower. The numerical value for the largest single load (for Wolf Creek Generating Station this is the Essential Service Water (ESW) pump motors) is not needed to comply with this requirement and was conservatively generated during the time when the diesel generators were being selected. The actual load for the ESW pump motors is less than the 1352 kW load listed in the Technical Specifications. As discussed in Regulatory Guide 1.9, after the operating license stage of review the consideration of a somewhat less conservative approach is permitted, such as operation with safety loads within the short-time rating of the diesel generator unit.

Since no new design requirements are being imposed and the change only clarifies how Wolf Creek Nuclear Operating Corporation complies with Regulatory Guide 1.9, Revision 1, the proposed changes do not significantly increase the probability of any accident or equipment malfunction previously evaluated, and there will be no significant increase in the consequences of an accident or equipment malfunction previously evaluated.

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

As stated above, the proposed change does not involve any design changes, hardware modifications, or change to the intended manner of plant operation. Thus this proposed change does not create the possibility for an accident or malfunction of a new or different type than any previously evaluated in the USAR.

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

The Bases for Technical Specification 3/4.8.1 refer to Regulatory Guides 1.9 and 1.108 with regard to surveillance requirements. The requirements to test for the loss of the single largest load will continue to be satisfied given the approval of this amendment request. No safety limits or limiting safety system settings are being changed. Therefore, this proposed change does not involve a significant reduction in the margin of safety as defined in the Bases for 3/4.8.1

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 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. The requested license amendment does not involve a significant hazards consideration.

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 51.21. This amendment request meets the criteria specified in 10 CFR 51.22(c)(9). Specific criteria contained in this section are discussed below.

(i) the amendment involves no significant hazards consideration

As demonstrated in the 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 release offsite.

The requested license amendment involves no change to the facility and does not require a change to operating procedures for implementation. 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 nature of the changes is administrative and does not create additional exposure to personnel nor affect levels of radiation present. The proposed changes do not result in significant individual or cumulative occupational radiation exposure.

Based on the above it is concluded that there will be no impact on the environment resulting from these changes. The changes meet 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.