

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Forrest T. Rhodes  
Vice President  
Engineering & Technical Services

June 11, 1992

ET 92-0122

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 Section 4.4 and Associated Bases -  
Surveillance Specimen Withdrawal Schedule

Gentlemen:

The purpose of this letter is to transmit an application for amendment to Facility Operating License No. KPF-42 for Wolf Creek Generating Station (WCGS), Unit No. 1. This license amendment request proposes revising Technical Specification Section 4.4 to delete the reactor vessel material surveillance specimen withdrawal schedule in Table 4.4-5. This request also proposes deleting references to this table found in Section 4.4.9.1.2 and the associated Bases.

Attachment I provides a description of the amendment along with a Safety Evaluation. Attachment II provides the Significant Hazards Considerations 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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PDR ADOCK 05000482  
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P.O. Box 411 - Burlington, KS 66839 - Phone: (316) 364-8831

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ADOCK

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/jra

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 KANSAS        3  
                              : 38  
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 12 day of June, 1992.

*Marlene Beachman*  
Notary Public

Expiration Date *Aug 4, 1999*



ATTACHMENT I  
SAFETY EVALUATION

## Safety Evaluation

### Proposed Change

The purpose of the proposed Technical Specification changes is to revise Section 4.4 in accordance with recommendations of Generic Letter 91-01, 'Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications'. The proposed changes will remove the surveillance specimen withdrawal schedule (Table 4.4-5) and associated references.

### Evaluation

The limiting conditions for operation (LCO) for the reactor coolant system include operating limits on pressure and temperature that are defined in figures that provide an acceptable region for operating during heatup, cooldown, criticality, and inservice leak and hydrostatic testing. An associated surveillance requirement addresses the frequency of verifying that operation is within the specified limits during these operating conditions. In addition, a separate surveillance includes the requirement that reactor vessel material surveillance specimens be removed and examined to determine changes in material properties, as required by 10 CFR Part 50, Appendix H, and in accordance with the schedule in Table 4.4-5.

The Bases Section for this Technical Specification contains information from the standard technical specifications (STS) providing a detailed description of the bases for this LCO and the associated surveillance requirements. The bases reference the TS table that provides the schedule for surveillance specimen withdrawal. The bases states that the heatup and cooldown curves are recalculated when data from the surveillance specimens indicate a change in material properties that exceeds the limiting value of those properties that were used to develop on the existing pressure and temperature limits. Finally, the bases section includes a table of the initial values of reactor vessel material properties and includes figures showing the effects of neutron fluence on the material characteristics and the predicted shifts in material characteristics.

The current bases provide extensive background information on the use of the data obtained from material specimens. This background information clearly defines the purpose and relationship of this information to the requirements included in the regulations and the American Society of Mechanical Engineers (ASME) Code. Therefore, the removal of the schedule for specimen withdrawal from the TS will not result in any loss of clarity related to regulatory requirements of Appendix H to 10 CFR Part 50.

The revision is an administrative change which revises sections of the Technical Specifications by deleting a table and its references and does not impact plant components, systems, or equipment. Since this is a duplication of requirements, the deletion of the table will not result in the loss of regulatory control. In addition, in order to obtain a readily available copy of the NRC-approved version of the specimen withdrawal schedule, this schedule will be included in the Updated Safety Analysis Report.

Based on the above discussions and the significant hazards consideration determinations presented in Attachment II, the proposed changes do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report; or create a possibility for 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 the basis for any technical specification. Therefore, the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

ATTACHMENT II  
SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

### **Significant Hazards Consideration Determination**

The proposed changes would revise Technical Specification Section 4.4 to delete the reactor vessel surveillance specimen - withdrawal schedule in Table 4.4-5 and references to this table found in Section 4.4.9.1.2 and the associated Bases.

#### **Standard 1 - Involve 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. The placement of this schedule in the technical specifications duplicate the controls on changes to this schedule that have been established in Section II.B.3 of Appendix H to 10 CFR Part 50. Therefore, removal of this schedule from the technical specifications does not decrease control of the schedule or affect plant equipment.

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

The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. These changes do not involve any change to the installed plant systems or the overall operating philosophy of WCGS.

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

The proposed changes do not involve a significant reduction in a margin of safety. This is based on the fact that the reactor vessel surveillance specimen withdrawal schedule is controlled by the requirements of 10 CFR 50, Appendix H. The removal of Table 4.4-5 and associated references from the technical specifications is purely administrative and does not impact any 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 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 requirement 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 released offsite**

The requested license amendment involves no change to the facility or operating procedures which would cause an increase in the amounts of effluents or create new types of effluents.

**(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.