

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Otto L. Maynard
Vice President Plant Operations

December 20, 1995

WO 95-0187

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
3/4.6.1.1 and 3/4.6.1.3 to Incorporate Option B of
10 CFR 50, Appendix J

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 to revise Technical Specification 3/4.6.1.1, "Containment Integrity," and 3/4.6.1.3, "Containment Leakage," and to add Technical Specification 6.8.4i to implement the new Containment Leakage Rate Testing Program as required by 10 CFR 50, Appendix J, Option B, for the Type A containment integrated leak rate tests and the Type B and C local leak rate tests.

Attachment I provides a description of the proposed change along with a Safety Evaluation. Attachment II provides a No Significant Hazards Consideration Determination. Attachment III provides the Environmental Impact Determination. The specific changes to the technical specifications proposed by this request are 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. This license amendment request is not required to address any immediate safety concern and is administrative in nature. However, this license amendment request would allow the integrated leak rate test, currently scheduled for the eighth refueling outage in March of 1996, to be evaluated for rescheduling based on the guidance of Regulatory Guide 1.163, dated September 1995. The license amendment request would allow the Type A integrated leak rate test to be scheduled according to the performance-based criteria of 10 CFR 50, Appendix J, and Regulatory Guide 1.163, dated September 1995, which endorses Nuclear Energy Institute 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," Revision 0, with exceptions. Therefore, approval of this license amendment request is requested prior to the eighth refueling outage which is scheduled to begin on March 2, 1996. This proposed revision to the WCGS Technical Specifications will be implemented prior to the beginning of the eighth refueling outage.

9601020278 951220
PDR ADOCK 05000482
P PDR

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

020099

An Equal Opportunity Employer M/F/HC/VET

A017
1/1

This request is being submitted in parallel with license amendment requests from Union Electric, Texas Utilities, and Pacific Gas and Electric Company to reduce NRC resources required for review.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4450, or Mr. Richard D. Flannigan, at extension 4500.

Very truly yours,



Otto L. Maynard

OLM/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
W. D. Johnson (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Otto L. Maynard, of lawful age, being first duly sworn upon oath says that he is Vice President Plant Operations 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 *Otto L. Maynard*
Otto L. Maynard
Vice President
Plant Operations

SUBSCRIBED and sworn to before me this 20th day of Dec, , 1995.

Mary E. Gifford
Notary Public

 **MARY E. GIFFORD**
Notary Public - State of Kansas
My Appt. Expires

Expiration Date 12/09/99

 **MARY E. GIFFORD**
Notary Public - State of Kansas
My Appt. Expires

ATTACHMENT I

SAFETY EVALUATION

Safety Evaluation

Proposed Change

This license amendment request proposes to revise Technical Specification 3/4.6.1.1, "Containment Integrity," and 3/4.6.1.3, "Containment Air Locks," and to add Technical Specification 6.8.4i, "Containment Leakage Rate Testing Program," to implement the new performance based leakage rate testing program as permitted by 10 CFR 50, Appendix J, rather than paraphrasing the requirements of the existing regulation. Also, Technical Specification 1.7e, "Containment Integrity," would be revised to reference Technical Specification 4.6.1.1.c instead of Technical Specification 4.6.1.1.d since the technical specification would be renumbered by the proposed changes addressed above. These proposed changes will support the implementation of the performance based testing of Option B to Appendix J, for Type A, B, and C containment leak testing and the appropriate rescheduling of testing.

Letter ET 95-0099, dated September 15, 1995, to NRC Document Control Desk, from R. C. Hagan, proposed revisions to the Wolf Creek Generating Station Technical Specifications to achieve an overall improvement in emergency diesel generator reliability and availability. The submittal proposed, in part, to add descriptions of the Diesel Fuel Oil Testing Program and the Emergency Diesel Reliability Program to Section 6 of the technical specifications. Specifically, the proposed program descriptions would be specified as Technical Specifications 6.8.4g and 6.8.4h, respectively. Therefore, based on the previous submittal, the proposed addition of a description of the Containment Leakage Rate Testing Program made by this proposed change has been specified as Technical Specification 6.8.4i.

A request to partially implement Option B for Type B and C testing has been submitted by Georgia Power Company for Vogtle Electric Generating Plant.

Justification

The proposed changes to Technical Specifications 3/4.6.1.1 and 3/4.6.1.3, and the addition of Technical Specification 6.8.4i, would revise or support the revision of the technical specifications to implement the new performance based leakage rate testing, verses paraphrasing Appendix J as is done in the present technical specifications. There are no changes to the test type, test methodologies or test acceptance criteria, only the required frequency of tests would be affected. These proposed changes are being submitted to allow Wolf Creek Nuclear Operating Corporation to implement a recent revision to Appendix J.

Implementation of the Containment Leakage Rate Testing Program would allow the integrated leak rate test presently scheduled for the eighth refueling outage to be rescheduled, since the criteria established by Appendix J, Option B, requiring only one integrated leak rate test in 10 years is presently satisfied by past integrated leak rate test results. Additionally, Type B and C tests presently scheduled for the eighth refueling outage could likewise be evaluated for rescheduling, since they may also meet the criteria for test frequency extension. Adoption of the new performance based leakage rate testing program will result in significant dollar and radiation exposure savings since unnecessary testing can be eliminated.

Background

The purpose of Appendix J leak test requirements is stated in the introduction to 10 CFR 50, Appendix J, as quoted below:

The purposes of the tests are to assure that (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications or associated bases and (b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment.

A revision to 10 CFR 50, Appendix J, was issued by the Commission on September 26, 1995, in Federal Register, Vol. 60, No. 186. The revision establishes Option B - Performance-Based Requirements, for conducting integrated leak rate tests and local leak rate tests. The Commission also issued Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, that endorses, with exceptions, NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," Revision 0.

The NRC Staff issued the revised 10 CFR 50, Appendix J, as part of the initiative to eliminate requirements that are marginal to safety. This effort is discussed in SECY-94-036, "Staff Plans for Revising 10 CFR 50, Appendix J, 'Containment Leakage Testing,' and for Handling Exemption Requests," dated February 17, 1994; and SECY-94-090, "Institutionalization of Continuing Program for Regulatory Improvement," dated March 31, 1994.

Appendix J, as revised by Option B, establishes new performance-based requirements and criteria for periodic leakage-rate testing. With Option B, the schedule requirements for Type A integrated leak rate tests and for Type B and C local leak rate tests will be based on results of past testing. NEI 94-01 was developed to implement the proposed Option B and the justification for extended test intervals for integrated leak rate tests and local leak rate tests is based on performance history and risk insights. Regulatory Guide 1.163, dated September 1995, which endorses NEI 94-01, Revision 0, with exceptions, provides specific guidance concerning a performance-based leakage test program, acceptable leakage-rate test methods, procedures, and analyses that may be used to implement the requirements and criteria of Option B. The new Containment Leakage Rate Testing Program would implement the performance based testing of Option B of 10 CFR 50, Appendix J.

Evaluation

As noted above, the NRC has reviewed and approved the regulation and the associated Regulatory Guide 1.163, dated September 1995, and determined that there are no safety consequences associated with the implementation of the new Option B testing program.

The proposed changes to Technical Specifications 3/4.6.1.1 and 3/4.6.1.3, and the addition of Technical Specification 6.8.4i, would reference the new Containment Leakage Rate Testing Program, rather than paraphrasing Appendix J. To comply with the requirements of Appendix J, Wolf Creek Nuclear Operating Corporation will implement the new performance based Containment Leakage Rate Testing Program to be consistent with the guidance of Regulatory Guide 1.163, dated September 1995. No new requirements would be added, no existing requirements would be deleted, other than reduced pressure testing and testing frequencies, and there are no changes to the test type or the test methodologies.

Because the proposed changes are administrative, Wolf Creek Nuclear Operating Corporation believes that this evaluation provides reasonable assurance that the proposed technical specification changes will not adversely affect the health and safety of the public.

Additional Information

License Amendment No. 76 and an exemption from the requirements of 10 CFR 50, Appendix J, Section III.D.1.(a), were granted for Wolf Creek Generating Station on August 12, 1994 and August 10, 1994, respectively. The license amendment and exemption provided one-time relief from the requirements to perform the overall integrated containment leakage rate test at intervals of 40 months plus or minus 10 months. The approval of the license amendment and exemption allowed the schedule for the third Type A test to be extended to the eighth refueling outage. However, with the adoption of 10 CFR 50, Appendix J, Option B, the overall integrated containment leakage rate test scheduled for the eighth refueling outage will be rescheduled, based upon past performance history of Type A tests performed at Wolf Creek Generating Station, using the criteria provided in NEI 94-01, Revision 0.

Based on the above discussions and the considerations presented in Attachment II, the proposed change does 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 change does not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

ATTACHMENT II

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

No Significant Hazards Consideration Determination

This license amendment request proposes to revise Technical Specification 3/4.6.1.1, "Containment Integrity," and 3/4.6.1.3, "Containment Air Locks," and to add Technical Specification 6.8.4i, "Containment Leakage Rate Testing Program," to implement the new performance based leakage rate testing program as permitted by 10 CFR 50, Appendix J, rather than paraphrasing the requirements of the existing regulation. Also, Technical Specification 1.7e, "Containment Integrity," would be revised to reference Technical Specification 4.6.1.1.c instead of Technical Specification 4.6.1.1.d since the technical specification would be renumbered by the proposed changes addressed above. These proposed changes will support the implementation of the performance based testing of Option B to Appendix J, for Type A, B, and C containment leak testing and the appropriate rescheduling of testing.

Evaluation

The proposed changes to the technical specifications do not involve a significant hazards consideration because operation of Wolf Creek Generating Station in accordance with these changes would not:

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

The proposed changes to Technical Specifications 3/4.6.1.1 and 3/4.6.1.3, and the addition of Technical Specification 6.8.4i to implement the new performance based Containment Leakage Rate Testing Program, have no effect on plant operation. The proposed changes only provide mechanisms within the technical specifications for implementing a performance-based methodology, for determining the frequency of leak rate testing, which has been approved by the NRC. The test type and test method used for testing would not be changed. The test acceptance criteria would not be changed, and containment leakage will continue to be maintained within the required limits.

Directly referencing the Containment Leakage Rate Testing Program for containment integrated leak rate test and local leak rate test requirements does not involve any modification to plant equipment or affect the operation or design basis of the containment. Leakage rate testing is not a precursor to or an initiating event for any accident.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed changes only allow for implementation of 10 CFR 50, Appendix J, Option B, testing frequencies and do not involve any modifications to any plant equipment or affect the operation or design basis of the containment. The proposed changes do not affect the response of the containment during a design basis accident.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed changes do not affect or change a Safety Limit, any limiting condition for operation or affect plant operations. The changes only implement the allowed Option B testing frequencies that have been determined by the NRC not to involve a safety concern. The testing method, acceptance criteria, and bases are not changed and still provide assurance that the containment will provide its intended function.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

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

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). The specific criteria contained in this section are discussed below.

(i) the amendment involves no significant hazards consideration

As demonstrated in the No 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 plant design bases and does not involve any change in the manner of operation of any plant systems involving the generation, collection or processing of radioactive materials or other types of effluents. 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 requested license amendment involves no change to the plant design bases and does not involve any change in the manner of operation of any plant systems involving the generation, collection or processing of radioactive materials or other types of effluents. Furthermore, implementation of this proposed change will not involve work activities which could contribute to occupational radiation exposure. Therefore, there will be no increase in individual or cumulative occupational radiation exposure associated with this proposed change.

Based on the above it is concluded that there will be no impact on the environment resulting from this change. The change meets 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.

ATTACHMENT IV
PROPOSED TECHNICAL SPECIFICATION CHANGES