

Otto L. Maynard Vice President Plant Operations

May 1, 1996

WO 96-0077

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

Subject: Revision to Technical Specification Section 6.0, - Organization and Position Title Changes

Gentlemen:

This letter transmits an application for amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station (WCGS), Unit No. 1. This license amendment request proposes revising Technical Specification Section 6.0 to reflect position title changes within the Wolf Creek Nuclear Operating Corporation (WCNOC) organization.

Attachment I provides a Safety Evaluation along with a detailed description of the proposed changes. Attachment II provides a Significant Hazards Consideration determination. Attachment III provides an Environmental Impact Determination. The specific changes to 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.

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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 Change

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.

> Otto L. Maynard Vice President Plant Operations

SUBSCRIBED and sworn to before me this 1 st day of May , 1996.

Expiration Date 12/09/1999

MARY E. GIFFORD Notary Public - State of Kansas My Appt. Expires 12/09/1999 Attachment I to WO 96-0077 Page 1 of 2

Attachment I

Safety Evaluation

Safety Evaluation

Proposed Change

This amendment request proposes to revise Technical Specification Section 6.0, throughout, to reflect an organization change and the change in title of the Vice President Plant Operations to Chief Operating Officer. In addition, this amendment proposes reassignment of management responsibilities to the Plant Manager as described below.

Evaluation

The duties of Vice President Plant Operations have been reassigned to the Plant Manager in sections 6.1.1, 6.2.1b., 6.5.1.1, 6.5.1.2, 6.5.1.6, 6.5.1.7, 6.5.1.8, 6.8.2, 6.13, and 6.14. This change reflects a restructuring of the operations department to provide increased emphasis on plant operations.

Section 6.5.1.7c. will be revised to indicate that in the event of disagreement between the Plant Safety Review Committee and the Plant Manager, that the Chief Operating Officer, rather that the Chief Executive Officer, shall be provided written notification within 24 hours.

These changes are administrative in nature and will enhance the organizational structure of Wolf Creek Nuclear Operating Corporation. These changes will not reduce overall organizational commitments. Based on this discussion and the considerations presented in Attachment II, the proposed changes do not increase the probability of occurrence or the consequences of 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 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.

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Attachment II

No Significant Hazards Consideration Determination

No Significant Hazards Consideration Determination

The proposed change would revise Technical Specification 6.0 to reflect title designation changes in the Wolf Creek Nuclear operating Corporation (WCNOC) organization.

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

The proposed change does not involve a significant increase in the probability of consequences of an accident previously evaluated. These changes involve administrative changes to the WCNOC organization and to the position qualification of plant personnel.

Standard II Create the Possibility of a new or different Kind of Accident from any Previously Evaluated.

The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This change is administrative in nature and does not involve a change to the installed plant systems or the overall operating philosophy of Wolf Creek Generating Station.

Standard III Involve a Significant reduction in the margin of Safety

The proposed change does not involve a significant reduction in a margin of safety. This change does not involve any changes in overall organizational commitments. A position title change alone does not reduce the 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 involve a significant reduction in the margin of safety.

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Attachment III

Environmental Impact Determination

Environmental Impact Detarmination

This 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 organizational changes do not involve a change to the facility or operating procedures which would create new types of effluents. The proposed changes do not involve any change in the manner of operation of any plant systems involving the generation, collection, storage or processing of radioactive materials or other types of effluents. Therefore, all offsite and control room doses will remain within the limits of 10 CFR 100 and 10 CFR 50 Appendix A, GDC 19.

(iii) there is no significant increase in individual or cumulative occupation radiation exposure

The proposed organizational changes do not involve a change to the facility or operating procedures which would create new types of effluents. The proposed changes do not involve any change in the manner of operation of any plant systems involving the generation, collection, storage or processing of radioactive materials or other types of effluents. Implementation of the proposed changes will not involve work activities which could contribute to occupational radiation exposure. Thus, these changes will not result in a significant increase in individual or cumulative occupational radiation exposure.

cased on the above, it is concluded that there will be no impact on the vironment resulting from the proposed changes and that the proposed changes meet 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.