

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan
Vice President Nuclear Assurance

December 22, 1992

NA 92-0139

U. S. Nuclear Regulatory Commission
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Reference: Letter dated June 4, 1987 from NRC to All Light Water
Reactor Licensees and Applicants (Generic Letter 87-09)
Subject: Docket No. 50-482: Revision to Technical Specifications
4.0.3 and 4.0.4 - Applicability of Surveillance
Requirements

Gentlemen:

The purpose of this letter is to transmit an application for amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station (WCGS), Unit No. 1. The license amendment request proposes revising Technical Specification Sections 4.0.3 and 4.0.4 and associated Bases on the applicability of Surveillance Requirements in accordance with the guidance in the Reference.

Generic Letter (GL) 87-09 proposed changes to Technical Specification Sections 3.0.4, 4.0.3 and 4.0.4. This request addresses Sections 4.0.3 and 4.0.4 only. The GL 87-09 proposed change to Section 3.0.4 was evaluated for application at WCGS and found to cause potential human factors concerns from the relocation of the existing exceptions throughout the text to a central location. The existing wording is correct and has become familiar to the operations personnel such that the proposed relocation may cause confusion without providing any substantial benefit. Therefore, no change to Section 3.0.4 is being requested.

The proposed changes to Section 4.0.3 and Bases 4.0.3 have been revised from those proposed in GL 87-09. The revision adds to Insert A the words "allowable outage" to the time limits of the ACTION requirements discussed in the second sentence to be more consistent with the wording used in the Bases. The revision deletes the last portion of the first paragraph of Insert C regarding enforcement action and the reporting requirements as this is inconsistent with the purpose of the Bases. It deletes the sentence in the middle paragraph of Insert C discussing the applicability of the 24-hour "grace" period for surveillances which take exception to Technical Specification 4.0.4, as this is inconsistent with how Wolf Creek Nuclear Operating Corporation (WCNOC) interprets these requirements. It also adds editorial changes to Insert C to provide consistency throughout the text of the Bases.

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ADD 1

WCNOC's interpretation of the technical specifications is that if an exception is granted to Technical Specification 4.0.4 for an individual surveillance requirement, the allowed surveillance interval is applicable. That is, the allowed surveillance interval is assumed to start at the time of entry into the mode for which the surveillance is required to be performed. WCNOC will, however, retain the practice of completing the surveillance as soon as it is practical to do so.

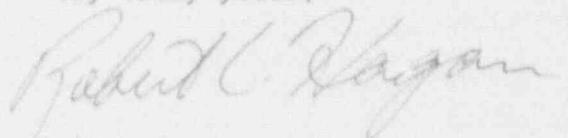
Using the proposed Technical Specification 4.0.3 Bases as presented in GL 87-09 would only provide 24 hours to complete all required surveillances before determining that the LCO has not been met and applying the ACTION requirements. Depending on plant conditions during start-up and rate of power ascension, it has been our experience that 24 hours is not adequate to perform all required surveillances. When numerous surveillances are required within 24 hours of a mode entry or upon reaching certain plant conditions, manpower considerations may not permit completing all required surveillances in a controlled deliberate manner within 24 hours. For this reason, the current practice of completing surveillances as soon as practicable after entry into a mode for which a 4.0.4. exception is granted should be retained.

Attachment I provides a description of the proposed 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 are provided in 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 proposed revision to the WCCS technical specifications will be fully implemented within 30 days of formal Nuclear Regulatory Commission approval.

If you have any questions concerning this matter, please contact me at (316) 364-8831 Ext. 4553 or Mr. Kevin J. Moles of my staff at Ext. 4565

Very truly yours,



Robert C. Hagan
Vice President
Nuclear Assurance

RCH/jra

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

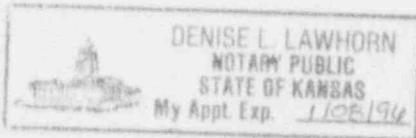
cc: G. W. Allen (KDHE), w/a
A. T. Howell (NRC), w/a
J. L. Milhoan (NRC), w/a
G. A. Pick (NRC), w/a
W. D. Reckley (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Robert C. Hagan, of lawful age, being first duly sworn upon oath says that he is Vice President Nuclear Assurance 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 Robert C. Hagan
Robert C. Hagan
Vice President
Nuclear Assurance

SUBSCRIBED and sworn to before me this 22 day of Dec. , 1992.



Denise L. Lawhorn
Notary Public

Expiration Date 1/08/96

ATTACHMENT I
SAFETY EVALUATION

Safety Evaluation

Proposed Change

The purpose of the proposed technical specification changes is to revise Sections 4.0.3 and 4.0.4 and associated Bases to incorporate the changes provided in Generic Letter 87-09, dated June 4, 1987, on the applicability of surveillance requirements.

Background

On June 4, 1987, the NRC issued Generic Letter 87-09, to address three problems identified in investigations of technical specification problems by both the NRC and Atomic Industrial Forum. The specific problems addressed in this generic letter relate to the general applicability requirements of the Limiting Conditions for Operation (LCOs) and Surveillance Requirements in Sections 3.0 and 4.0 of the Technical Specifications. The proposed change to Section 3.0 was not considered beneficial for Wolf Creek Generating Station (WCGS), so no change is being requested.

Evaluation

Technical Specification 4.0.3

Technical Specification 4.0.3 currently requires that equipment with late or missed surveillance(s) be declared inoperable. The Bases for Technical Specification 4.0.3 state "ACTION statements are entered when the Surveillance Requirements should have been performed rather than at the time it is discovered that the tests were not performed." Technical Specification 4.0.3 is being changed to specify that the time limits of the ACTION requirements are applicable from the time it is identified that a Surveillance Requirement has been missed, not the time it should have been performed. In addition, the change will permit completion of the surveillance within 24 hours when the allowable outage time limits of the ACTION requirements are less than 24 hours.

It is overly conservative to assume that systems or components are inoperable when a Surveillance Requirement has not been performed. The opposite is in fact the case; the vast majority of surveillances demonstrate that systems or components are in fact OPERABLE. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance. Because the allowable outage time limits of some ACTION requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements may apply, the technical specifications should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. The 24-hour time limit is an acceptable time limit for completing a missed surveillance when the allowable outage times of the ACTION requirements are less than this time limit or when shutdown ACTION requirements are applicable. The 24-hour time limit balances the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with ACTION requirements before the surveillance can be completed.

Technical Specification 4.0.4

Technical Specification 4.0.4 prohibits entry into an OPERATIONAL MODE or other specified condition when Surveillance Requirements have not been performed within the specified surveillance interval. A conflict with this technical specification exists when a MODE change is required as a consequence of shutdown ACTION requirements and when the Surveillance Requirements that become applicable have not been performed within the specified surveillance interval. For instance, the plant could previously have been in a MODE for which the Surveillance Requirements were not applicable and, therefore, the surveillance may not have been performed within the specified time interval. Consequently, the ACTION requirements of the LCO associated with these Surveillance Requirements apply and the unit may have to be placed in a lower MODE of operation than that required by the original shutdown ACTION requirements, or other remedial actions may have to be taken, if the surveillance cannot be completed within the time limits for these actions.

Currently conformance with Technical Specification 4.0.4 would require the performance of these surveillances before entering a MODE for which they apply. Source and intermediate range nuclear instrumentation and cold over pressure protection systems are examples of systems for which Surveillance Requirements may become applicable as a consequence of MODE changes to comply with shutdown ACTION requirements. The proposed changes in Specification 4.0.3 permit a delay of up to 24 hours in the applicability of the ACTION requirements, thereby placing an appropriate time limit on the completion of Surveillance Requirements that become applicable as a consequence of MODE changes to comply with ACTION requirements. This change to Technical Specification 4.0.4, can lower the potential for a plant upset and challenge to safety systems if surveillances would have been performed during a shutdown to comply with ACTION requirements. Technical Specification 4.0.4 is also being modified per Generic Letter 87-09 to note that its provisions shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements. It is not the intent of Technical Specification 4.0.4 to prevent passage through or to OPERATIONAL MODES to comply with ACTION requirements and it should not apply when MODE changes are imposed by ACTION requirements.

Pursuant to the above information, as provided per Generic Letter 87-09, this proposed amendment request does not adversely affect the health and safety of the public and does not involve an unreviewed safety question.

ATTACHMENT II
SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Significant Hazards Consideration Determination

The proposed license amendment would revise Technical Specification Sections 4.0.3 and 4.0.4 and its associated Bases. These changes are consistent with the guidance provided in Generic Letter 87-09. The following sections discuss the proposed change under the three standards of 10 CFR 50.92.

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

The proposed changes to the application of ACTION requirements and Surveillance Requirements enhances the consistent operation of the facility preventing unnecessary shutdowns, thereby avoiding conditions in which the plant is more susceptible to upset. Allowing adequate time to perform missed surveillances avoids pressure on the plant staff to perform both surveillance and plant shutdown simultaneously. Since the proposed change does not involve any change to the configuration or method of operation of plant equipment, it does 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 change does not alter the method and manner of plant operation. The intent of these changes is to resolve the problems regarding the general requirements of Section 4.0 of the Technical Specifications. The changes therefore 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 Safety.

The consistent and reasonable application of Surveillance Requirements and their associated ACTION requirements is the intent of the changes to Technical Specification 4.0.3 and 4.0.4. The provision allowing a minimum of 24 hours to complete a missed surveillance allows adequate time to perform required activities while avoiding unnecessary cycling of the facility. The potential for a reduced margin of safety due to the malfunctioning of equipment during this time period is more than compensated for by the increased margin of safety in maintaining the plant in a steady state condition. Therefore, the proposed change does not involve a significant reduction in a 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 accidents previously evaluated; or create the possibility of a new or different kind of accident from any previously evaluated; or involve a significant reduction in a margin of safety. Therefore, the requested license amendment does not involve a significant hazards consideration.

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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, this proposed amendment does not involve any significant hazards considerations.

(ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

This 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 that may be released offsite.

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

The nature of the changes is administrative and does not require additional exposure by personnel nor affect levels of radiation present. The proposed change does not result in significant individual or cumulative occupational radiation exposure.

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