NUREG-0881
Supplement No. 6

Safety Evaluation Report

related to the operation of
Wolf Creek Generating Station,
Unit No. 1

Docket No. STN 50-482

Kansas Gas and Electric Company, et al.

U.S. Nuclear Regulatory Commission

Office of Nuclear Reactor Regulation

June 1985

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ABSTRACT

This report supplements the Safety Evaluation Report (SER) for the application filed by the Kansas Gas and Electric Company, as applicant and agent for the owners, for a license to operate the Wolf Creek Generating Station, Unit 1 (Docket No. STN 50-482). The facility is located in Coffey County, Kansas. This supplement has been prepared by the Office of Nuclear Reactor Regulation of the U.S. Nuclear Regulatory Commission and provides recent information regarding resolution of the license conditions identified in the SER. Because of the favorable resolution of the items discussed in this report, the staff concludes that the facility can be operated by the licensee at power levels greater than 5% without endangering the health and safety of the public.

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1 INTRODUCTION AND GENERAL DISCUSSION

1.1 Introduction

The Kansas Gas and Electric Company (KG&E), acting as applicant and agent for the owners, filed an application for an operating license (OL) for the Wolf Creek Generating Station, Unit 1 (Docket No. STN 50-482), located in Coffey County, Kansas. KG&E is one of two utilities that joined together under the acronym SNUPPS (Standardized Nuclear Unit Power Plant System) to submit applications for OLs for a standard plant design for review under the Commission's standardization policy using the duplicate plant option described in Appendix N of Part 50 of the Code of Federal Regulations, Title 10 (10 CFR 50). The other SNUPPS OL application submitted for review was that submitted by Union Electric Company (UE) for the Callaway Plant (Docket No. STN 50-483), located in Callaway County, Missouri.

In April 1982, the Nuclear Regulatory Commission (NRC) issued its Safety Evaluation Report (SER) (NUREG-0881) for the application filed by KG&E. Supplement 1 to the SER (SSER 1) was issued in August 1982, Supplement 2 (SSER 2) was issued in June 1983, Supplement 3 (SSER 3) was issued in August 1983, Supplement 4 (SSER 4) was issued in December 1983, and Supplement 5 (SSER 5) was issued in March 1985. These documents contained a number of items that were not resolved with the applicant. These items were categorized as

(1) Outstanding items that needed to be resolved before the issuance of an operating license.

(2) Items for which the staff had completed its review and had determined positions about which there appeared to be no significant disagreement between the applicant and the staff. However, further information was needed to confirm these positions.

(3) Items for which the staff had taken positions and would require implementation and/or documentation after the issuance of the OL. These would be conditions to the OL.

The purpose of this sixth supplement (SSER 6) is to provide the staff evaluation of those items that required resolution before 5% of rated power could be exceeded and to address changes to the SER that resulted from the receipt of additional information. Each of the following sections of this supplement is numbered the same as the section of the SER and its supplements that is being updated and, unless otherwise noted, the discussions are supplementary to and not in lieu of the previous discussions.

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The NRC Project Manager assigned to the OL application for Wolf Creek is Mr. Paul W. O'Connor. Mr. O'Connor may be contacted by calling (301) 492-4708 or writing

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U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

1.7 Summary of Outstanding Items

Listed below are the issues identified as outstanding in Section 1.8 of the SER. All of the outstanding issues were resolved in the supplement that is cited parenthetically.

Part A*

A(1) Seismic and dynamic qualification of seismic Category I mechanical and electrical equipment** (closed in SSER 5)

A(2) Environmental qualification of safety-related electrical equipment** (closed in SSER 5)

A(3) TMI Action Plan (SER Section 22)

- I.A.1.1 Shift Technical Advisor (closed in SSER 5)
- I.D.1 Control room design review (closed in SSER 5)
- III.A.1.2 Upgrade emergency support facilities (removed in SSER 4)

A(4) Onsite emergency preparedness (removed in SSER 4)

Part B**

B(1) High-energy pipe break hazards analysis (closed in SSER 1)

B(2) Pump and valve operability assurance program (closed in SSER 5)

B(3) Fire protection program - alternate shutdown panel (closed in SSER 3)

B(4) TMI Action Plan (SER Section 22)

- I.C.1 Guidance for evaluation and development of procedures for transients and accidents (closed in SSER 5)
- I.C.8 Pilot monitoring of selected emergency procedures for near-term operating license applications (closed in SSER 5)

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*Part A lists the site-specific items; Part B contains the SNUPPS items that are common to both Wolf Creek and its sister plant Callaway.
**This item includes both plant-specific and duplicate-plant information.

II.B.2 Plant shielding to provide access to vital areas and protect safety equipment for postaccident operation (closed in SSER 2)

1.8 Confirmatory Items

The following is an update of each of those confirmatory items in Section 1.8 of the SER. As a result of revisions to the Final Safety Analysis Report, additional information provided via letters, and the submittal of the draft Technical Specifications, several confirmatory items have been resolved. These items are noted below.

Part A*

A(1) UHS dam dispersiveness (closed in SSER 1)

A(2) Main dam seepage (closed in SSER 5)

A(3) Site-specific seismic structural analysis (closed in SSER 1)

A(4) Identification of base metal and heat-affected zone surveillance material (closed in SSER 2)

A(5) Pressure-temperature limits (closed in SSER 2)

A(6) Fire protection site visit (closed in SSER 5)

A(7) Security plan (closed in SSER 1)

A(8) TMI Action Plan (closed in SSER 4)

II.K.1 IE bulletin on measures to mitigate small break LOCAs and loss-of-feedwater accidents (closed in SSER 4)

III.A.2 Improving licensee emergency preparedness--long-term (closed in SSER 4)

A(9) Onsite emergency preparedness (closed in SSER 5)

Part B**

B(1) Additional seismic instrumentation and control room indication (closed in SSER 1)

B(2) Analysis of steam generator tube plugging (closed in SSER 4)

B(3) Testing of pressure isolation valves (closed in SSER 2)

B(4) Fuel assembly structural response to seismic and loss-of-coolant accident (LOCA) forces (closed in SSER 2)

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*Part A lists the site-specific items.

**Part B contains the SNUPPS items that are common to both Wolf Creek and its sister plant Callaway.

B(5) Preservice inspection testing program (closed in SSER 5)

B(6) Steam generator inservice inspection (closed in SSER 4)

B(7) ECCS analysis (closed in SSER 1)

B(8) Steam generator level control and protection (closed in SSER 4)

B(9) Capability for safe shutdown following loss of a bus supplying power to instruments and controls (closed in SSER 5)

B(10) Operator actions required to maintain safe shutdown from outside control room (closed in SSER 5)

B(11) Reactor coolant temperature indicators on the auxiliary shutdown panel (closed in SSER 5)

B(12) Volume control tank level control and protection interaction (closed in SSER 4)

B(13) Boron dilution control (closed in SSER 5)

B(14) Environmental qualification of control systems (closed in SSER 5)

B(15) Circuitry for automatic transfer of diesel generator from test to auto control mode (closed in SSER 3)

B(16) Diesel generator reliability qualification testing (closed in SSER 3)

B(17) Circuitry for bypass of protective circuitry (closed in SSER 3)

B(18) Circuitry for inservice testing per Regulatory Guide 1.108 (closed in SSER 3)

B(19) Low and or degraded grid voltage (closed in SSER 5)

B(20) Use of regulatory-type transformer as isolation device (closed in SSER 3)

B(21) Isolation of control room and remote circuits (closed in SSER 5)

B(22) Sequencing of loads on the offsite power system (closed in SSER 5)

B(23) Submerged electrical equipment (closed in SSER 3)

B(24) Separation between redundant safety-related cables inside control panels (closed in SSER 3)

B(25) Compliance with position 1 of Regulatory Guide 1.63 (closed in SSER 5)

B(26) Monitoring of rocker arm lube oil system temperature for diesel generators (closed in SSER 4)

B(27) Reactor coolant pump locked rotor accident (closed in SSER 1)

B(28) TMI Action Plan (SER Section 22)

II.D.1 Performance testing of BWR and PWR relief and safety valves (closed in SSER 5)

II.E.1.1 Recommendation GS-2, physical locking of isolation valve. (closed in SSER 4)

II.E.4.2 Containment isolation dependability (closed in SSER 4)

II.F.1 Additional accident monitoring instrumentation, Attachments 1, 2, and 3 (Attachment 3, closed in SSER 2; Attachments 1 and 2, closed in SSER 4)

II.K.2.13 Thermal mechanical report--effect of high-pressure injection on vessel integrity for small-break LOCA with no auxiliary feedwater (closed in SSER 3)

II.K.3.2 Report on overall safety effect of PORV isolation system (closed in SSER 2)

II.K.3.11 Justification of use of certain PORVs (closed in SSER 4)

III.D.1.1 Integrity of systems outside containment likely to contain radioactive material (closed in SSER 5)

B(29) Test of engineered safeguards P-4 interlock (closed in SSER 4)

B(30) Automatic indication of block of signals initiating auxiliary feedwater following trip of main feedwater pumps (closed in SSER 4)

B(31) Actuation of valve component level windows on the bypassed and inoperable status panel (closed in SSER 4)

B(32) Postaccident monitoring (closed in SSER 5)

B(33) Indicators, alarms, and test features provided for instrumentation used for safety functions (closed in SSER 4)

B(34) Interlocks for reactor coolant system pressure control during low-temperature operative (closed in SSER 4)

B(35) Capacity and capability of offsite circuits (closed in SSER 5)

1.9 License Conditions

The list below updates the status of the license conditions reported in Section 1.9 of the SER and of SSER 1, 2, 3, 4, and 5. As a result of additional information received from the licensee, initiation of low-power operation, and revisions to the SNUPPS Final Safety Analysis Report (FSAR), License Conditions (LCs) 20, 24, and 26 have been satisfied. The remaining conditions will be closed on the noted schedule.

Part A*

A(1) Compliance with Appendix R of 10 CFR 50, Fire Protection (SER Section 9.5.1.7)**

Part B**

B(1) Surveillance of hafnium control rods (SER and SSER 2 Section 4.2.3.1(10)).

B(2) The applicant must provide an initial inservice inspection program which conforms to the applicable ASME Code edition and 10 CFR 50 (SER Sections 5.2.4 and 6.6.1).

B(3) The applicant must implement the secondary water chemistry monitoring and control program proposed in the SNUPPS FSAR (through Revision 6) and their letter dated May 8, 1981 (removed in SSER 5)

B(4) Sensor time response testing (removed in SSER 5)

B(5) Tests of engineered safeguards P-4 interlocks (removed in SSER 1)

B(6) Automatic indication of block of signals initiating auxiliary feedwater following trip of the main feedwater pumps (removed in SSER 1)

B(7) Steam generator level control and protection (removed in SSER 1)

B(8) Indicator, alarms, and test features provided for instrumentation used for safety functions (removed in SSER 3)

B(9) Reactor coolant temperature indications on the auxiliary shutdown panel (removed in SSER 3)

B(10) Actuation of valve component level windows on the bypassed and inoperable status panel (removed in SSER 1)

B(11) Postaccident monitoring (removed in SSER 2)

B(12) Interlocks for reactor coolant system (RCS) pressure control during low-temperature operation (removed in SSER 3)

B(13) Volume control tank level control and protection interaction (removed in SSER 3)

B(14) Boron dilution control (removed in SSER 3)

B(15) Bypass of protective trips on diesel generator (removed in SSER 3)

B(16) Installation of battery discharge alarm (removed in SSER 3)

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*Part A lists the site-specific items; Part B contains the SNUPPS items that are common to both Wolf Creek and its sister plant Callaway.
**This item includes both plant-specific and duplicate-plant information.

B(17) TMI Action Plan (SER and SSER 4 Section 22)

II.B.3 Postaccident sampling capability (removed in SSER 5)

B(18) Operation restriction above 90% of full power (removed in SSER 4)

B(19) Experienced PWR operator or startup engineer required onshift for one year or until sufficient operating experience is acquired (closed in SSER 5 Section 13.1.2.3)

B(20) Seismic and dynamic qualification (SSER 5 Section 3.10, removed in SSER 6)

B(21) Fire protection (SER Section 9.5.1, SSER 5 Section 9.5.1.8)

B(22) Post Fuel Loading Initial Test Program (SER Section 14, SSER 5 Section 14)

B(23) Emergency planning progress (SSER 5 Section 13.3)

B(24) Emergency planning - letters of agreement (SSER 5 Section 13.3, removed in SSER 6; at the first refueling outage)

B(25) Steam generator tube rupture (SSER 5 Section 15.4.4)

B(26) Low-temperature overpressure protection (SSER 5 Section 5, removed in SSER 6)

B(27) LOCA reanalysis (SSER 5 Section 15.3.7; at the first refueling outage)

B(28) Generic Letter 83-28

3 DESIGN CRITERIA FOR STRUCTURES, SYSTEMS, AND COMPONENTS

3.10 Seismic and Dynamic Qualification of Seismic Category I Mechanical and Electrical Equipment

3.10.1 Seismic and Dynamic Qualification of Seismic Category I Mechanical and Electrical Equipment

In SSER 5 the staff recommended low-power operation of Wolf Creek. The staff has subsequently completed its review of the licensee's seismic and dynamic qualification program (SER Section 3.10.1) and found the program to be acceptable because it meets all the applicable portions of General Design Criteria (GDC) 1, 2, 4, 14 and 30 of Appendix A to 10 CFR 50, Appendix B to 10 CFR 50, and Appendix A to 10 CFR 100. On the basis of its findings and the acceptance of the licensee's justification for interim operation, as stated in SSER 5, and the staff requirement that the licensee provide written confirmation of the completion of all items of the program in accordance with approved standards, the staff recommends full-power operation for Wolf Creek Unit 1.

On the basis of the above evaluation, License Condition 2C(5) is satisfied and has been removed.

5 REACTOR COOLANT SYSTEM

5.2 Integrity of Reactor Coolant Pressure Boundary

License Condition 2.C.(7) requires that "By June 1, 1985, KG&E shall submit for NRC review and approval a description of equipment modifications to the residual heat removal system (RHRS) suction isolation valves and to closure circuitry which conform to the applicable staff requirements (SRP 5.2.2)."

By letter dated May 22, 1985, the licensee submitted its response to License Condition 2.C.(7). Therefore, License Condition 2.C.(7) is satisfied and has been removed from the full-power license.

13 CONDUCT OF OPERATIONS

13.1 Organizational Structure and Qualifications

13.1.2 Operating Shift Crews

License Condition 2.C.(7) requires, in part, that "prior to exceeding 5% power, KG&E shall certify to the NRC the names of the advisors who have been examined and have been determined to be competent to provide advice to the operating shifts."

By letter dated May 29, 1985, the licensee provided the names of the six individuals who would serve as the shift advisors. Therefore, this portion of License Condition 2.C.(7) is satisfied and has been removed from the full-power license.

13.3 Emergency Preparedness Evaluation

13.3.1 Federal Emergency Management Agency (FEMA) Findings on Offsite Emergency Plans and Preparedness

In Supplement No. 5 to the SER, the staff provided a status report on the FEMA evaluation of offsite emergency plans and preparedness and indicated that FEMA's findings and determinations would be provided in a future supplement. FEMA has completed its assessment and reported its findings in a memorandum to the NRC dated January 24, 1985. On the basis of a review of the offsite plans and evaluation of the November 7, 1984, exercise and a remedial drill held on December 19, 1984, FEMA believes that (1) the state and local emergency plans are adequate and capable of being implemented and (2) the exercises demonstrated that offsite preparedness is adequate to provide reasonable assurance that appropriate measures can be taken to protect the health and safety of the public living in the vicinity of the site in the event of a radiological emergency. The remedial drill successfully demonstrated the county's capability to activate a siren that failed to operate during the November 1984 exercise thereby resolving a Category A deficiency (i.e., a deficiency that would lead to a negative finding in preparedness) identified by FEMA during the exercise.

In a recent decision, GUARD v. NRC, 753 F.2d 1144 (D.C. Cir. 1985), the U.S. Court of Appeals vacated the Commission's interpretation of 10 CFR 50.47(b)(12) to the extent that a list of facilities was found to constitute adequate arrangements for medical services from members of the public offsite exposed to dangerous levels of radiation. The Commission has now provided guidance to be followed in determining compliance with this regulation pending its determination of how it will proceed in response to the Court's remand. In particular, the Commission directed that licensing Boards and, in uncontested cases, the staff should consider the uncertainty attendant to the commission's interpretation of this regulation, especially in regard to its interpretation of the term "contaminated injured individuals." In GUARD, the Court left open to the Commission discretion to reconsider whether that term should include members of the offsite public exposed to dangerous levels of radiation and, thus, whether

arrangements of this population of individuals are required at all. For this reason, the Commission observed that it may reasonably be concluded that "no additional actions should be taken now on the strength of the present interpretation of that term." Accordingly, the Commission observed that it can be found "that any deficiency which may be found in complying with a finalized post GUARD planning standard (b)(12) is insignificant for the purposes of 10 CFR 50.47.(c)(1)." In this regard, the Commission, as a generic matter, noted the low probability of accidents that might result in exposure of members of the offsite public to dangerous levels of radiation as well as the slow development of adverse reactions to overexposure. See, Emergency Planning; Statement of Policy, 50 FR 20892, May 21, 1985.

Consistent with the foregoing Statement of Policy, the applicant has, by letter dated May 30, 1985, confirmed that, in good faith reliance on the Commission's earlier interpretation of 10 CFR 50.47(6)(12), the emergency plans of the involved offsite response jurisdictions contain a list of medical service facilities. The existence of such a list in the pertinent plans has also been confirmed by FEMA. As stated by the Commission, such good faith reliance in the circumstances can be found to constitute "other compelling reasons" within the meaning of 10 CFR 50.47(c)(1). Further, the licensee has committed to fully comply with the Commission's response to the Court's remand.

Accordingly, on the basis of the factors identified by the Commission in its Statement of Policy, the staff has determined that the requirements of 10 CFR 50.47(c)(1) have been satisfied so as to warrant issuance of the operating license pending further action by the Commission with respect to the requirements of 10 10 CFR 50.47(b)(12).

13.3.2 Atomic Safety and Licensing Board Conditions

In an Initial Decision issued on July 2, 1984, the Atomic Safety and Licensing Board (ASLB) specified two conditions to be met before full-power operation (i.e., operation above 5% of rated power) and nine staff confirmatory items. All of the ASLB conditions and confirmatory items were related to offsite preparedness. The staff reported in SSER 5 that, based on information provided by FEMA, one condition related to letters of agreement with hospitals and nursing homes had been satisfied, one condition related to letters of agreement for medical transportation services had been partially satisfied, and that all of the confirmatory items with the exception of one item related to a second telephone line in the County Engineer's office had been verified as completed.

In the January 24, 1985, memorandum to the NRC, FEMA reported that all letters of agreement for the transportation of hospital and nursing home patients with the exception of one ambulance service had been received and that sufficient litter-carrying capacity is provided even without the one ambulance service. In a letter to the NRC dated February 14, 1985, the licensee provided a copy of a letter of agreement dated February 4, 1985, with Lyon County Ambulance Service, the one remaining ambulance service. With regard to the confirmatory item, FEMA reported that a second telephone line had been installed in the County Engineer's office. On the basis of information provided by FEMA, the staff concludes that the conditions and confirmatory items specified by the ASLB for Wolf Creek have been satisfactorily completed.

13.3.3 Conclusion

On the basis of its review of the FEMA findings and determinations on the adequacy of state and local emergency plans and preparedness, and on the previous NRC assessment of the adequacy of the licensee's onsite emergency plans and preparedness (see SSER 5 dated March 1985), the staff concludes that the overall state of onsite and offsite emergency preparedness provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at Wolf Creek.

*Memorandum from R. W. Krimm, FEMA, to E. L. Jordan, NRC, subject: Supplemental Interim Findings on Kansas State and local Emergency Plans and Preparedness for the Wolf Creek Generating Station.

APPENDIX A

CONTINUATION OF CHRONOLOGY OF NRC STAFF RADIOLOGICAL SAFETY REVIEW OF WOLF CREEK

February 1, 1985	Letter from SNUPPS concerning Wolf Creek Technical Specifications.
February 3, 1985	Letter from applicant transmitting letters of agreement required by the Wolf Creek Generating Station Atomic Safety and Licensing Board (ASLB) decision.
February 14, 1985	Letter from applicant transmitting letters of agreement required by ASLB decision.
February 14, 1985	Letter from applicant transmitting Revision 8 to the Security Plan.
February 18, 1985	Letter from applicant transmitting supplemental information on structural steel welding.
February 18, 1985	Letter from applicant concerning main steam and feedwater isolation valves.
February 19, 1985	Letter from SNUPPS concerning Wolf Creek Technical Specifications.
February 22, 1985	Letter from applicant transmitting supplemental information regarding Chapter 17 of the Wolf Creek FSAR.
February 22, 1985	Letter from SNUPPS concerning justifications for interim operation-seismic qualification.
February 22, 1985	Letter from applicant concerning inservice testing program for pumps and valves.
February 25, 1985	Letter from SNUPPS concerning Wolf Creek Technical Specifications.
February 27, 1985	Representatives from NRC and Kansas Gas and Electric (KG&E) met in Bethesda, Maryland, to discuss KG&E's resolution to issues related to the review of structural steel welding. (Summary issued March 28, 1985.)
February 28, 1985	Letter from applicant concerning Wolf Creek Licensing Submittals.
March 1, 1985	Letter to applicant transmitting a revised draft license for Wolf Creek.

March 4, 1985	Letter from applicant concerning Technical Specifications.
March 11, 1985	Letter to applicant transmitting NPF-33 for fuel loading and low-power testing with Technical Specifications "A" (NUREG-1104) and "B"
March 20, 1985	Letter to applicant transmitting 20 copies of Supplement No. 5 to the Wolf Creek SER (NUREG-0881).
March 27, 1985	Letter from applicant concerning payment for Wolf Creek Operating License.
April 1, 1985	Letter to applicant concerning FEMA Supplement Interim Finding on Offsite Plans and Preparedness for Wolf Creek.
April 1, 1985	Letter from SNUPPS concerning task analysis for SNUPPS detailed control room design review.
April 12, 1985	Letter from applicant concerning containment sump screens.
April 16, 1985	Letter from applicant concerning Wolf Creek Indemnity Agreement Amendment.
April 17, 1985	Letter to applicant concerning approval of the Solid Control Program for implementation.
May 1, 1985	Letter from applicant concerning Technical Specifications.
May 3, 1985	Letter from applicant transmitting the 1984 Annual Financial Reports for Kansas Gas and Electric Company and Kansas Power & Light Company and Kansas Electric Power Cooperative, Inc.
May 7, 1985	Letter from applicant transmitting a report on Integrated Rate Test.
May 9, 1985	Letter to applicant requesting additional information Generic Letter 83-28 (Items 4.1, 4.2.1, and 4.2.2).
May 10, 1985	Letter from applicant transmitting changes to the Wolf Creek Technical Specifications.
May 23, 1985	Letter from applicant submitting information required by License Condition 2.C.(7).
May 29, 1985	Letter from applicant certifying the names of the shift advisors.

APPENDIX D
NRC STAFF CONTRIBUTORS

This supplement is a product of the NRC staff. The following staff member were principle contributors to this report:

Name	Title	Review Branch
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A. Lee	Electrical Engineer	Equipment Qualification
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13. SUPPLEMENTARY NOTES
Docket No. STN 50-482

14. ABSTRACT (200 words or less)

Supplement No. 6 to the Safety Evaluation Report related to the operation of the Wolf Creek Generating Station, Unit No. 1 updates the information contained in the Safety Evaluation Report, dated April 1982 and Supplements, 1, 2, 3, 4, and 5, dated August 1982, June 1983, August 1983, December 1983, and March 1985, respectively. Supplement No. 6 concludes that the facility can be operated by the licensee at power levels greater than 5% without endangering the health and safety of the public.

The Safety Evaluation and its supplements pertains to the application for a license to operate the Wolf Creek Generating Station, Unit No. 1 filed by Kansas Gas and Electric Company on February 18, 1980. The Construction Permit No. CPPR-147 was issued on May 17, 1977 and a low power 5% license issued on March 11, 1985. The facility is located in Coffey County, Kansas.

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