



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. ROESTER
VICE PRESIDENT - NUCLEAR

February 26, 1986

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

KMLNRC 86-033
Re: Docket No. STN 50-482
Ref: 1) KMLNRC 86-007, dated 1/20/86, from GLKoester, KG&E to
HRDenton, NRC;
2) KMLNRC 86-008, dated 1/20/86, from GLKoester, KG&E to
HRDenton, NRC
Subj: Supplemental Information and Modification of Proposed
Revision to Technical Specification 4.6.1.2

Dear Mr. Denton:

The purpose of this letter is to provide supplemental information requested by the staff and to modify the proposed Technical Specification changes and requested exemption from the requirements of 10 CFR 50, Appendix J, Section III.D.3 provided in the References. Reference 1 requested a revision to the Wolf Creek Generating Station, Unit No. 1, Technical Specifications to allow an extension of the testing interval specified in 10 CFR 50, Appendix J, Section III.D.3. Reference 2 requested a temporary exemption to the requirements of 10 CFR 50, Appendix J, Section III.D.3.

Penetrations identical in configuration and utilizing identical components to those identified in the References have been successfully tested at the Callaway Plant which has been in commercial operation for approximately one year. These penetrations were successfully tested during both the preoperational testing program and subsequent tests to fulfill the periodic requirements of 10 CFR 50, Appendix J, Section III.D.3. During the subsequent tests, these penetrations tested successfully without any rework or repair. It should be noted that the analyses provided by the References assumed that valve leakage existed. The conclusion, that no significant hazard existed, was reached assuming that leakage through these penetrations was present.

As stated in Reference 2, the Commission has provided that special circumstances must be present for an exemption request to be considered. They have further provided that special circumstances exist when, "The exemption would provide only temporary relief from the applicable regulation and the Licensee or applicant has made good faith efforts to comply with the

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regulation;". Initial local leak rate testing (LLRT) was done in parallel with the preoperational testing program at Wolf Creek Generating Station. This allowed all required LLRT's to be current at the time of License issuance and therefore fuel loading and unit startup could begin promptly without the delay that performing numerous LLRT's would have caused.

It is generally not advantageous to perform surveillances or tests at intervals much shorter than required. This results in unnecessarily frequent operation of equipment and unnecessary radiation exposure to workers with no recognized concurrent gain in operational safety. Since initially entering Mode 3 on April 26, 1985 Wolf Creek Generating Station has not re-entered Mode 4. Kansas Gas and Electric Company (KG&E) believes that there has not been an outage of sufficient duration and appropriate plant conditions to perform the LLRT's delineated in the References, within a time frame reasonably close to the required testing interval.

Contrary to the operational history of Wolf Creek Generating Station, industry experience indicates that an outage of sufficient duration and appropriate plant conditions to perform testing of this type is likely to occur during unit operation in Cycle 1. KG&E believes that a " ... good faith effort to comply with the regulation;" has been made, but that the exemplary performance of the unit has prevented the tests from being performed.

Kansas Gas and Electric Company requests that the previous submittals be revised to allow a one-time only deferment of the Type C local leak rate testing for the valves delineated in Table 4.6.1.2-1 until July 13, 1986. The proposed changes to the Wolf Creek Generating Station, Unit No. 1, Technical Specifications are provided as an attachment to this letter. Testing of the additional valves mentioned in the References will be completed by the required due date associated with each valve. Valves BG-V135 and BG-HV8100, associated with penetration P-24, will be tested safely at Power Operation through the use of a temporary system modification rather than the normal surveillance procedure.

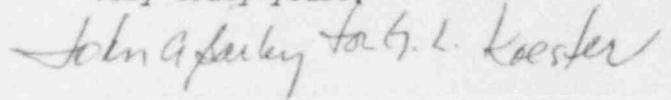
At the present time KG&E desires to keep Wolf Creek Generating Station on line to support system power needs. Temporary deferment of these tests will allow KG&E to take Wolf Creek Generating Station off-line at a time consistent with system need for power and the Wolf Creek Generating Station Owner's overall program of power management.

The conclusions of the Safety Analysis and Significant Hazards Consideration provided by the References are still wholly valid and correct. Based on the

February 26, 1986

technical analyses provided by the references and the supplemental information provided herein KG&E requests that an exemption to the requirements of 10 CFR 50, Appendix J, Section III.D.3, and the Technical Specification revisions discussed above be granted by the Nuclear Regulatory Commission. If you have any questions concerning this matter please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,

A handwritten signature in cursive script that reads "John A. Farley for G. L. Koester".

Glenn L. Koester
Vice President - Nuclear

GLK:see

Attachment

cc: PO'Connor (2)
JCummins
GAllen
EJohnson

ATTACHMENT
TO
KMLNRC 86-033