

Richard A. Muench Vice President Engineering

July 3, 1997

ET 97-0065

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

> Reference: WCNOC Letter ET 97-0050, dated May 15, 1997, from R. A. Muench, WCNOC, to the NRC Subject: Docket No. 50-482: Proposed Revision to Technical Specification Section 6.0, "Administrative Controls"

#### Gentlemen:

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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 revising Technical Specification Section 6.0, "Administrative Controls," to reflect position title changes within the Wolf Creek Nuclear Operating Corporation (WCNOC) organization. The position title for the Shift Supervisor is being revised to Shift Manager and the title for the Supervising Operator is being revised to Control Room Supervisor.

The Reference provided an application for conversion of the current technical specifications to the improved standard technical specifications. Attachment 19 of the Reference provided a clean version of the improved technical specifications. The changes requested by this license amendment request have been marked-up in the improved technical specifications.

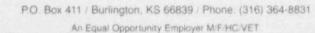
It is requested that this proposed revision be approved in conjunction with the Reference. Implementation of this proposed revision would be performed in conjunction with the implementation of the improved technical specifications because of the volume of required procedure changes.

A Safety Evaluation of the proposed change is provided in Attachment I, and Attachment II provides a No Significant Hazards Consideration Determination. Attachment III is the Environmental Impact Determination for the proposed change, and the marked-up current technical specification pages for this request are provided in Attachment IV. Attachment V provides the marked-up improved technical specification pages for this request.

In accordance with 10 CFR 50.91, a copy of this revision to our original 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 4034, or Mr. Richard D. Flannigan, at extension 4500.

Very truly yours,

Allace

Richard A. Muench

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Attachments

I -- Safety Evaluation II -- No Significant Hazards Consideration Determination III -- Environmental Impact Cevermination

IV -- Proposed Changes to Current Technical Specifications

V -- Proposed Changes to Improved Technical Specifications

cc: V. L. Cooper (KDHE), w/a W. D. Johnson (NRC), w/a E. W. Merschoff (NRC), w/a J. F. Ringwald (NRC), w/a

J. C. Stone (NRC), w/a

STATE OF KANSAS ) SS COUNTY OF COFFEY 1

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Richard A. Muench, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering 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

Richard A. Muench Vice President Engineering

Notary Public - State of Kansas My Appt. Expires 07/03/99

SUBSCRIBED and sworn to before me this 3rd day of July, 1997. ANGELA E. WESSEL Notary Public Statestel Notary Public

Expiration Date July 3, 1999

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ATTACHMENT I

SAFETY EVALUATION

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#### Safety Evaluation

## Proposed Change

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This letter transmits an application for amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station (WCGS). This license amendment request revises Technical Specification Section 6.0, "Administrative Controls," to reflect position title changes within the Wolf Creek Nuclear Operating Corporation (WCNOC) organization. The position title for the Shift Supervisor is being revised to Shift Manager in 6.1.2, 6.2.2e., Table 6.2-1, 6.2.4, and 6.12.2. The title for the Supervising Operator is being revised to Control Room Supervisor in 6.1.2, Table 6.2-1, and 6.12.2.

On May 15, 1997, WCNOC submitted a license amendment request for conversion of the current technical specifications to the improved standard technical specifications. Attachment 19 of the May 15, 1997 amendment request provided a clean version of the improved technical specifications. The changes requested by this license amendment request have been marked-up on the improved technical specifications.

## Evaluation

The position title of Shift Supervisor is being revised to Shift Manager. Changing this title to Shift Manager more accurately reflects the management functions and responsibilities being performed by these individuals. The position title of Supervising Operator is being revised to Control Room Supervisor. Changing this title to Control Room Supervisor reflects the control room command functions associated with this position. These title changes are administrative in nature and do not represent any change in reporting relationships, job responsibilities, or overall organizational changes.

Regulation 10 CFR 50.54(1) states: "The licensee shall designate individuals to be responsible for directing the licensed activities of licensed operators. These individuals shall be licensed as senior operators pursuant to part 55 of this chapter." The regulation implies that the Shift Supervisors are required to report to an individual licensed as a senior reactor operator (SRO). The Shift Managers will continue to report to a licensed SRO (currently the Manager Operations).

Based on the above discussions and the no significant hazards consideration determination 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 to ET 97-0065 Page 1 of 2

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ATTACHMENT II

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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## No Significant Hazards Consideration Determination

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

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

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. These position title changes are administrative changes to the WCNOC organization and as such have no effect on plant equipment or the technical qualification of plant personnel.

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

The proposed changes do not affect any previously evaluated accident scenarios, nor does it create any new accident scenarios. These changes are administrative in nature and do not involve any change to the installed plant systems or the overall operating philosophy of Wolf Creek Generating Station.

Therefore, this proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

## 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. These changes do not involve any change in overall organizational commitments. Changes in the position titles 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 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. The requested license amendment does not involve a significant hazards consideration.

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ATTACHMENT III

ENVIRONMENTAL IMPACT DETERMINATION

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### 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) 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 changes involve no changes to the facility 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 proposed changes involve no changes to the facility 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 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 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 requiring a specific environmental assessment by the Commission.