

October 7, 1998

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, Kansas 66839

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON THE PROPOSED
CONVERSION TO THE IMPROVED STANDARD TECHNICAL
SPECIFICATIONS FOR WOLF CREEK NUCLEAR GENERATING
STATION, UNIT NO. 1 (TAC NO. M98738)

Dear Mr. Maynard:

The Nuclear Regulatory Commission staff is reviewing the Wolf Creek Nuclear Operating Corporation's proposed license amendment to convert the current technical specifications for Wolf Creek Nuclear Generating Station, Unit No. 1 to the Improved Standard Technical Specifications. Wolf Creek Nuclear Operating Corporation provided their proposed license amendment request by letter dated May 15, 1997.

The staff has reviewed selected portions of the application. Based on its review, the staff has determined that additional information is needed in Section 3.8, Subsections 3.8.1, 3.8.2, 3.8.3, 3.8.9, and 3.8.10, Electrical Power Systems, as discussed in the enclosure. The request for additional information was electronically transmitted to your staff on October 5, 1998, to expedite the review process.

To assist the staff in maintaining its review schedule, please respond to the questions within 30 days of the date of this letter. If you have any questions regarding the RAI, please contact me at (301) 415-1362. If all four utilities would like to have a common discussion, a single meeting, or phone call, it can be coordinated by contacting the NRR Lead Project Manager, Jack Donohew at (301) 415-1307.

Sincerely,
Original Signed By

Kristine M. Thomas, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

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DFO1

Docket No. 50-482

Enclosure: Request for Additional Information

cc w/encl: See next page

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cc w/encl:

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**Wolf Creek improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10**

3.8.1, AC Sources - Operating

3.8.1-01	CP(3.8.1-01) CW(3.8.1-01) WC	ITS 3.8.1 Required Actions A.2 and B.2 TS 3.8.1 Note for Required Action B.2 Bases for ITS 3.8.1 Required Action A.2, STS Bases markup page B 3.8-6 Bases for ITS 3.8.1 Required Action B.2, STS Bases markup page B 3.8-9 Bases for STS 3.8.1 Required Actions A.2 and B.2 Reviewer's Notes CTS 3/4.8.1.1 Action c
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Required Actions A.2 and B.2 for ITS 3.8.1 specify to declare required feature(s) with no offsite power available or supported by the inoperable DG inoperable when its required redundant feature(s) is inoperable. The Bases for STS 3.8.1 Required Actions A.2 and B.2 contain the same Reviewer's Note. The Reviewer's Notes address when the turbine driven auxiliary feedwater pump (TDAFWP) is required to be considered a redundant required feature. The Note associated with Required Action B.2 states, "In Modes 1, 2, and 3, the TDAFWP is considered a required redundant feature." Required Action A.2 does not have this Note. The Bases for Required Action A.2 states, "A TDAFWP is not required , because an additional single failure is not required to be postulated during the allowed outage time associated with this Condition." This is a proposed difference with the Bases for STS 3.8.1 Required Action A.2.

Comment: Not having a Note associated with Required Action A.2 for ITS 3.8.1 that addresses the TDAFWP appears to be inconsistent with Required Action B.2, and not in conformance with the STS Reviewer's Notes. Revise the submittal to provide the explanation/justification for this apparent inconsistency and nonconformance, or add a Note addressing the TDAFWP to Required Action A.2

No justification has been provided to support the proposed Bases difference. Revise the submittal to provide the appropriate justification or expand the Bases for Required Action A.2 to address including the TDAFWP as a redundant required feature.

Licensee Response:

3.8.1-02	CW(3.8.01-02) WC	ITS 3.8.1 Required Action F.2 CTS Table 3.3-3 item 10, Action 25
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Required Action F.2 for ITS 3.8.1 states, "Restore load shedder and emergency load sequencer to Operable status," with a Completion Time of 12 hours. This is a proposed change relative to Action 25 for item 10 for corresponding CTS Table 3.3-3.

Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

Comment: If the LSELS inoperability causes both offsite and onsite power sources to the bus to be inoperable, this constitutes a dead bus. A dead bus invokes LCO 3.8.9 and its requirement to restore the bus to OPERABLE status is 8 hours. Should the completion time of 12 hours be changed. Revise the submittal to provide the appropriate justification.

Licensee Response:

3.8.1-03	CP(3.8.1-06) CW(3.8.1-03) DC(3.8.1-14) WC	ITS SR 3.8.1.3 Note 4 STS SR 3.8.1.3 Note 4 CTS 4.8.1.1.2.a.5
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Note 4 for STS SR 3.8.1.3 states, "This SR shall be preceded by and immediately follow without shutdown a successful performance of SR 3.8.1.2 or SR 3.8.1.7." This Note has been adopted in corresponding ITS SR 3.8.1.3, and is a proposed change relative to corresponding CTS 4.8.1.1.2.a.5.

Comment: The CTS markup does not show this proposed change, and no justification has been provided to support the proposed change. Revise the submittal to show the proposed change on the CTS markup, and provide the appropriate justification.

Licensee Response:

3.8.1-04	CP(3.8.1-07) WC	DOC 01-51-LS CTS 4.8.1.1.2.a.3 ITS SR 3.8.6 Bases for ITS SR 3.8.6, STS Bases markup page B 3.8-20 Bases for STS SR 3.8.1.6
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CTS 4.8.1.1.2.a.3 requires verifying the fuel transfer pump starts and transfers fuel from the storage system to the day tank at least once per 31 days on a Staggered Test Basis. A 92 Day Frequency has been proposed for corresponding ITS SR 3.8.1.6. DOC 01-51-LS states that 92 days is typical of the frequency applied to testing other safety-related pumps. The Bases for STS SR 3.8.1.6 states that when the design of fuel transfer systems is such that pumps operate automatically or must be started manually in order to maintain an adequate volume of fuel oil in the day tank during or following DG testing, a 31 day Frequency is appropriate.

Comment: The proposed change appears to be in conflict with the STS Bases. Revise the submittal to retain the CTS Frequency of 31 days.

**Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10**

Licensee Response:

3.8.1-05	CW(3.8.1-04) WC	STS SR 3.8.1.8 Bases for STS SR 3.8.1.8 ITS 3.8.1
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STS SR 3.8.1.8 requires verifying the transfer of AC power sources from the normal offsite circuit to each alternate offsite circuit. This requirement has not been adopted in corresponding ITS 3.8.1.

Comment: No justification has been provided to support the proposed difference. Revise the submittal to provide the appropriate justification for the proposed difference.

Licensee Response:

3.8.1-06	WC	ITS SR 3.8.1.12.d STS SR 3.8.1.12.d CTS 4.8.1.1.2.g.3
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STS SR 3.8.1.12.d states, "Permanently connected loads remain energized from the offsite power system." This requirement has been adopted as ITS SR 3.8.1.12.d, and is a proposed change relative to corresponding CTS 4.8.1.1.2.g.3.

Comment: The proposed change does not appear in the CTS markup, and no justification has been provided to support the proposed change. Revise the submittal to show the proposed change on the CTS markup, and provide the appropriate justification for the proposed change.

Licensee Response:

3.8.1-07	WC	ITS SR 3.8.1.14 STS SR 3.8.1.14
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ITS SR 3.8.1.14 requires verifying full-load carrying capability of the diesel generator at a power factor between 0.8 and 0.9. This is a proposed difference relative to corresponding STS SR 3.8.1.14 which requires verifying full-load carrying capability of the diesel generator at a power factor ≤ 0.9 .

Comment: No justification has been provided to support the proposed difference. Revise the submittal to provide the appropriate justification for the proposed difference.

Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

Comment: No justification has been provided for this proposed difference. Revise the submittal to provide the appropriate justification, or conform to the STS.

Licensee Response:

3.8.1-14	WC	Bases for ITS 3.8.1 Required Action A.2, STS Bases markup page 7 Bases for ITS 3.8.1 Required Action B.2, STS Bases markup page 9 Bases for ITS 3.8.1 Required Actions C.1 and C.2, STS Bases markup page 12 Bases for STS 3.8.1 Required Actions A.2, B.2, C.1, and C.1
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The Bases for Required Actions A.2, B.2, C.1, and C.1 for STS 3.8.1 specify that a required feature or a required feature on the other train is inoperable. The Bases for Required Actions A.2, B.2, C.1, and C.1 for ITS 3.8.1 specify that a required feature or a required feature on the other train is inoperable and not in the safeguards position. These are proposed differences relative to the STS.

Comment: No justification has been provided to support these proposed differences. Revise the submittal to provide the appropriate justifications, or conform to the STS.

Licensee Response:

3.8.1-15	WC	Bases for STS 3.8.1 Surveillance Requirements, STS Bases markup page B 3.8-16
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The Bases for STS 3.8.1 Surveillance Requirements discusses the applicability of specified voltage and frequency tolerances. This material has not been adopted in the Bases for corresponding ITS 3.8.1.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification for the proposed difference.

Licensee Response:

Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

3.8.1-16	CW(3.8.1-13) WC	ITS SR 3.8.1.2 Note 3 STS SR 3.8.1.2 Note 3 Bases for ITS SRs 3.8.1.2 and 3.8.1.7, STS Bases markup page B 3.8-17, fourth paragraph
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The Bases for ITS SRs 3.8.1.2 states, "These start procedures are the intent of Note 3, which is only applicable when such modified start procedures are recommended by the manufacturer."

Comment: Confirm that the DG manufacturer has recommended modified start procedures that would make Note 3 applicable to the plant, or revise the submittal to delete Note 3 from ITS 3.8.1.2 and also delete the Bases material associated with Note 3.

Licensee Response:

3.8.1-17	CP(3.8.1-20) DC(3.8.1-33) WC	Bases for ITS SR 3.8.1.11, STS Bases page 3.8-25 Bases for STS SR 3.8.1.11 Bases for ITS SR 3.8.1.17, STS Bases page 3.8-30 Bases for STS SR 3.8.1.17 Bases for ITS SR 3.8.1.18, STS Bases page 3.8-31 Bases for STS SR 3.8.1.18 Bases for ITS SR 3.8.1.19, STS Bases page 3.8-32 Bases for STS SR 3.8.1.19
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The Bases for ITS SRs 3.8.1.11, 3.8.1.17, 3.8.1.18, and 3.8.1.19 state, "This Note does not prohibit the application of LCO 3.0.5." These are proposed differences relative to the Bases for STS SRs 3.8.1.11, 3.8.1.17, 3.8.1.18, and 3.8.1.19.

Comment: The Notes for ITS SRs 3.8.1.11, 3.8.1.17, 3.8.1.18, and 3.8.1.19 do not provide any exceptions. The proposed differences appear to be in conflict with the Notes. No justification has been provided to support the proposed differences. Revise the submittal to provide the appropriate justification, or conform to the STS.

Licensee Response:

3.8.1	No Beyond Scope Items
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Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

3.8.2, AC Sources - Shutdown

3.8.2-01	CP(3.8.2-01) CW(3.8.2-01) WC	JFD 3.8-45 ITS LCO 3.8.2 STS LCO 3.8.2 Bases for ITS LCO 3.8.2.1, STS Bases markup page B 3.8-37, second paragraph Bases for STS LCO 3.8.2.1
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STS LCO 3.8.2 refers to the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.10. ITS LCO 3.8.2 refers to subsystem not subsystem(s). The Bases for ITS LCO 3.8.2.1 refers to when the second train of AC electrical power distribution is needed to support redundant required systems, equipment, and components.

Comment: ITS LCO 3.8.2 seems not to provide all of the requirements needed for the Applicability. JFD 3.8-45 does not explain why the proposed difference is acceptable. Revise the submittal to provide the appropriate justification for the proposed difference, or conform to the STS.

Licensee Response:

3.8.2-02	CP(3.8.2-05) CW(3.8.2-02) DC(3.8.2-01) WC	DOC 01-44-LG CTS 3/4.8.1.2 Action ITS 3.8.2
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The Action for CTS 3/4.8.1.2 states, "... or crane operation with loads over the spent fuel pool." This material is not being retained in corresponding ITS 3.8.2 in accordance with the STS. DOC 01-44-LG states that this material is being moved to licensee controlled documents.

Comment: DOC 01-44-LG does not provide an adequate justification for relocating the CTS requirements regarding crane operation with heavy loads over the spent fuel pool.

Licensee Response:

Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

3.8.2-03	CP(3.8.2-07) CW(3.8.2-03) DC(3.8.2-03) WC	DOC 01-47-LS CTSs 4.8.1.2 and 4.8.1.1.2.h ITS SRs 3.8.2.1 and 3.8.1.20 Bases for ITS SR 3.8.2.1, STS Bases markup page B 3.8-40
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CTS 4.8.1.2 states that CTS 4.8.1.1.2.h is applicable in Modes 5 and 6. ITS SR 3.8.2.1 states that corresponding ITS SR 3.8.1.20 is not applicable in Modes 5 and 6, in conformance with the STS.

Comment: DOC 01-47-LS does not explain why the proposed change is acceptable. Revise the submittal to provide the appropriate justification for the proposed change.

Licensee Response:

3.8.2-04	WC	CTS Table 4.3-2, item 10 ITS SRs 3.8.2.1 and 3.8.1.21 STS SR 3.8.2.1 Bases for ITS SR 3.8.2.1, STS Bases markup page B 3.8-40
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ITS SR 3.8.2.1 states that ITS SR 3.8.1.21 is applicable in Modes 5 and 6. This is a proposed change relative to corresponding CTS Table 4.3-2, item 10.

Comment: No justification has been provided to support the proposed change. Revise the submittal to provide the appropriate justification for the proposed change.

Licensee Response:

3.8.2-05	WC	CTS Table 4.3-2, item 10 ITS SR 3.8.2.1 Note STS SR 3.8.2.1 Note ITS SR 3.8.1.21 Bases for ITS LCO 3.8.2.1, STS Bases markup page B 3.8-41
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The Note for ITS SR 3.8.2.1 states that ITS SR 3.8.1.21 is not required to be performed. This is a proposed change relative to corresponding CTS Table 4.3-2, item 10.

Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

Comment: No justification has been provided to support the proposed change. Revise the submittal to provide the appropriate justification for the proposed change.

Licensee Response:

3.8.2-06	CP(3.8.2-08) CW(3.8.2-05) WC	Bases for ITS LCO 3.8.2.1, STS Bases markup page B 3.8-37 Bases for STS LCO 3.8.2.1
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The Bases for ITS LCO 3.8.2.1 states, "... when the second train of AC electrical power distribution is needed to support redundant required systems, equipment, and components, an offsite circuit must also support the second AC electrical power distribution train to the extent necessary to power the redundant required systems, equipment, and components." This is a proposed difference relative to the Bases for STS LCO 3.8.2.1.

Comment: The Bases does not address the DG support that is required when the second AC electrical power distribution train is needed to support redundant required systems, equipment, and components. Revise the submittal to expand the Bases to address this issue.

Licensee Response:

3.8.2	No Beyond Scope items
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**Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10**

3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air

3.8.03-01	CW(3.8.03-01) DC(3.8.03-01) WC(3.8.03-01)	DOC 01-49-LS ITS 3.8.3 Condition A
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Condition A for ITS 3.8.3 addresses the storage tank fuel level for one or more DGs. Associated Required Action A.1 requires to restore the fuel oil level to within limits with a Completion Time of 48 hours. These are proposed changes relative to the CTS.

Comment: DOC 01-49-LS does not explain why these proposed changes are acceptable. Revise the submittal to provide the appropriate justification for the proposed changes.

Licensee Response:

3.8.03-02	CW(3.8.03-02) WC	DOC 01-49-LS ITS 3.8.3 Condition A
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Condition A for ITS 3.8.3 addresses one or more DGs with fuel level > 74,200 gal in the storage tank. This is a proposed change relative to the CTS.

Comment: DOC 01-49-LS does not provide specific technical justification for this value. Revise the submittal to provide the justification for this value.

Licensee Response:

3.8.03-03	CW(3.8.03-03) DC(3.8.03-03) WC	DOC 01-48-M ITS SR 3.8.3.2 Bases for ITS SR 3.8.3.2, STS Bases markup page B 3.8-47 STS SR 3.8.3.2 ITS 3.8.3 Condition B Bases for ITS 3.8.3 Required Action B.1, STS Bases markup page B 3.8-45
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STS SR 3.8.3.2 requires verifying the lubricating oil inventory. This requirement has been adopted as corresponding ITS SR 3.8.3.2 which requires verifying lubricating oil inventory is \geq 750 gal. Condition B for ITS 3.8.3 addresses one or more DGs with lube oil inventory < 750 gal and > 686 gal. These are proposed changes relative to the CTS.

Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

Comment: DOC 01-48-M does not provide specific technical justification for these values. Revise the submittal to provide the justification for these values.

Licensee Response:

3.8.03-04	WC	ITS SR 3.8.3.2 ITS 3.8.3 Condition B
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The CTS markup for ITS SR 3.8.3.2 requires verifying lubricating oil inventory is ≥ 750 gal. The CTS markup for Condition B for ITS 3.8.3 addresses one or more DGs with lube oil inventory < 948 gal. The STS markup shows both of these values as 750 gal.

Comment: Revise the submittal to resolve this apparent discrepancy.

Licensee Response:

3.8.03-05	CP(3.8.03-01) CW(3.8.03-04) DC(3.8.03-05) WC	DOC 01-48-M EITS SR 3.8.3.4 STS SR 3.8.3.4 ITS 3.8.3 Condition E Bases for ITS 3.8.3 Required Action E.1, STS Bases markup page B 3.8-46
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STS SR 3.8.3.4 requires verifying each DG air start receiver pressure. This requirement has been adopted as corresponding ITS SR 3.8.3.4 which requires verifying pressure in two starting air receivers is ≥ 435 psig or pressure in one starting air receiver is ≥ 610 psig, for each DG starting air subsystem. Condition E for ITS 3.8.3 addresses one or more DGs with two starting air receivers Operable with pressure < 435 psig and ≥ 250 psig or one or more DGs with only one starting air receiver Operable with pressure < 610 psig and ≥ 300 psig. These are proposed changes relative to the CTS.

Comment: DOC 01-48-M does not provide specific technical justification for these values. Revise the submittal to provide the justification for these values.

Action would not be required if the starting air receivers were Operable. Revise the submittal to delete the term "Operable" from Condition E.

Licensee Response:

Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

3.8.03-09	CW(3.8.03-08) WC	Bases for ITS SR 3.8.3.2, STS Bases markup page B 3.8-47 Bases for STS SR 3.8.3.2
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The Bases for STS SR 3.8.3.2 describes the requirement to verify the capability to transfer the lube oil from its storage location to the DG when the DG lube oil sump does not hold adequate inventory. This material has not been adopted in the Bases for corresponding ITS SR 3.8.3.2.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification for the proposed difference.

Licensee Response:

3.8.03-10	CW(3.8.03-09) DC(3.8.03-13) WC	Bases for ITS SR 3.8.3.4, STS Bases markup page B 3.8-50 Bases for STS SR 3.8.3.4
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The Bases for STS SR 3.8.3.4 states, "[A start cycle is defined by the DG vendor, but usually is measured in terms of time (seconds of cranking) or engine cranking speed.] This subject has not been addressed in the Bases for corresponding ITS SR 3.8.3.4.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification or conform to the STS.

Licensee Response:

3.8.3	No Beyond Scope items
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Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

3.8.9, Distribution Systems - Operating

3.8.9-01	CW(3.8.09-01) WC	ITS 3.8.9 Condition B and Required Action B.1 STS 3.8.9 Condition B and Required Action B.1 CTS 3/4.8.3.1 Action b
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Condition B and Required Action B.1 for STS 3.8.9 specify requirements in the event that one AC vital bus becomes inoperable. These requirements have been adopted as Condition B and Required Action B.1 for corresponding ITS 3.8.9 which require that with one AC vital bus subsystem inoperable, restore the AC vital bus subsystem to Operable status with a Completion Time of 2 hours. This is a proposed change relative to Action b for corresponding CTS 3/4.8.3.1 which requires, "With one AC vital bus either not energized from its associated inverter, or ... (1) reenergize the AC vital bus within 2 hours ..."

Comment: No justification has been provided for this proposed administrative change. Revise the submittal to provide the appropriate justification for the proposed change.

Licensee Response:

3.8.9-02	WC	ITS 3.8.9 Condition C and Required Action C.1 STS 3.8.9 Condition C and Required Action C.1 CTS 3/4.8.3.1 Action c
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Condition C and Required Action C.1 for STS 3.8.9 specify requirements in the event that one DC electrical power distribution subsystem becomes inoperable. These requirements have been adopted as Condition C and Required Action C.1 for corresponding ITS 3.8.9 which require that with one DC electrical power distribution subsystem inoperable, restore the DC electrical power distribution subsystem to Operable status with a Completion Time of 2 hours. This is a proposed change relative to Action c for corresponding CTS 3/4.8.3.1 which requires, "With one DC bus not energized from its associated battery bank or charger, reenergize the DC bus from its associated battery bank or charger within 2 hours ..."

Comment: No justification has been provided to support this proposed administrative change. Revise the submittal to provide the appropriate justification for the proposed change.

Licensee Response:

3.8.9	No Beyond Scope items
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Wolf Creek Improved TS Review Comments
ITS Section 3.8, Electrical Power Systems
3.8.1, 3.8.2, 3.8.3, 3.8.9, 3.8.10

3.8.10, Distribution Systems - Shutdown

3.8.10-01	CP(3.8.10-01) CW(3.8.10-01) DC(3.8.10-01) WC	DOC 03-06-LS JFD 3.8-45 ITS LCO 3.8.10 STS LCO 3.8.10 CTS 3.8.3.2 Bases for ITS LCO 3.8.10, STS Bases markup page B 3.8-97
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STS LCO 3.8.10 specifies, "The necessary portion of the AC, DC, and AC vital bus electrical power distribution subsystems ..." Corresponding ITS LCO 3.8.10 specifies, "The necessary portion of the Train A or Train B AC, DC, and AC vital bus electrical power distribution subsystems ..." JFD 3.8-45 states that the power distribution systems have been revised to retain the CTS requirement that one train shall be operable when shutdown. Corresponding CTS 3.8.3.2 states, "As a minimum, one of the following divisions of electrical buses shall be energized in the specified manner: ..." DOC 03-06-LS merely restates the proposed change.

Comment: The STS requires the necessary portion of all of the electrical power distribution subsystems to be Operable. The ITS requires the necessary portion of one train to be Operable. JFD 3.8-45 does not explain why the proposed difference is acceptable. Revise the submittal to provide the appropriate justification for the proposed difference.

The CTS requires an entire train of buses to be Operable. The ITS requires the necessary portion of a train to be Operable. DOC 03-06-LS does not explain why the proposed change is acceptable. Revise the submittal to provide the appropriate justification for the proposed change.

Licensee Response:

3.8.10-02	CP(3.8.10-02) CW(3.8.10-02) WC	DOC 03-06-LS JFD 3.8-45 ITS LCO 3.8.10 STS LCO 3.8.10 CTS 3.8.3.2 Bases for ITS LCO 3.8.10, STS Bases markup page B 3.8-97, last two paragraphs
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STS LCO 3.8.10 states, "... shall be Operable to support equipment required to be Operable." Corresponding ITS LCO 3.8.10 states, "... shall be Operable to support one train of equipment required to be Operable." JFD 3.8-45 also refers to "one train of equipment required to be Operable." Corresponding CTS 3.8.3.2 does not contain any reference to supported equipment

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required to be Operable. DOC 03-06-LS refers to "... equipment required to be operable in this plant condition ..." The Bases for ITS LCO 3.8.10 refers to providing support for redundant required systems.

Comment: There appears to be a discrepancy between ITS LCO 3.8.10 and the Bases for ITS LCO 3.8.10. Confirm that only one train of supported equipment is required to be Operable in Modes 5 and 6, or revise ITS LCO 3.8.10 to conform to the STS.

Licensee Response:

3.8.10-03	CP(3.8.10-03) CW(3.8.10-03) DC(3.8.10-02) WC	DOC 03-03-LS CTS 3/4.8.3.2 Action ITS 3.8.10 Condition A and Required Action A.2.4 STS 3.8.10 Condition A and Required Action A.2.4
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Condition A for STS 3.8.10 addresses, "One or more required AC, DC, or AC vital bus electrical power distribution subsystems inoperable." This has been adopted as Condition A for corresponding ITS 3.8.10, and is a proposed change relative to the Action for corresponding CTS 3/4.8.3.2 which states, "Without one of the above required divisions of electrical buses energized in the required manner..." Required Action A.2.4 for STS 3.8.10 states, "Initiate actions to restore required AC, DC, and AC vital bus electrical power distribution subsystems to Operable status." This requirement has been adopted as Required Action A.2.4 for corresponding ITS 3.8.10, and is a proposed change relative to the Action for corresponding CTS 3/4.8.3.2 which states, "... initiate corrective action to energize at least one division of the required buses in the specified manner..."

Comment: DOC 03-03-LS does not address these proposed changes. Revise the submittal to provide the appropriate justification for these proposed changes.

Licensee Response:

3.8.10-04	CW(3.8.10-04) WC	Bases for Applicable Safety Analyses for ITS 3.8.10, STS Bases markup pages B 3.8-95 and 96 Bases for Applicable Safety Analyses for STS 3.8.10
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The Bases for the Applicable Safety Analyses for ITS 3.8.10 contains generic descriptive material that compares the requirements in Modes 5 and 6 with those in Modes 1, 2, 3, and 4. This is a proposed difference relative to the Bases for the Applicable Safety Analyses for corresponding STS 3.8.10.

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Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification for the proposed difference or conform to the STS.

Licensee Response:

3.8.10-05	CP(3.8.10-04) CW(3.8.10-05) WC(3.8.10-05)	Bases for ITS LCO 3.8.10, STS Bases markup page B 3.8-97 Bases for STS LCO 3.8.10
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The Bases for ITS LCO 3.8.10 states that when the second DC electrical power distribution train or the second subsystem of AC vital bus electrical power distribution is needed to support redundant required systems, equipment and components, the second train may be energized from any available source. This is a proposed difference with the Bases for corresponding STS LCO 3.8.10.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification for this proposed difference, or conform to the STS. The justification shall include an evaluation of all of the events identified in the USAR that are postulated to occur during the Applicability, with a determination of the acceptability of not requiring the second DC train and the second subsystem of AC vital bus to be energized by their respective associated sources. The evaluation should confirm that all of the equipment that is assumed to operate to mitigate the various postulated events can still be relied on to operate with this proposed change.

Licensee Response:

3.8.10-06	WC	Bases for STS 3.8.10 Actions, STS Bases markup page B 3.8-98 Bases for ITS 3.8.10 Actions
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The Bases for the Actions for STS 3.8.10 states that the Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained. This is a proposed difference with the Bases for the Actions for corresponding STS 3.8.10.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification for this proposed difference.

Licensee Response:

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3.8.10 No Beyond Scope items
