

Richard A. Muench  
Vice President Engineering

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

OCT 16 1998  
ET 98-0085

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

Reference: 1) Letter dated August 14, 1998, from K. M. Thomas, NRC to  
O. L. Maynard, WCNOG  
2) Letter ET 97-0050, dated May 15, 1997, from  
R. A. Muench to USNRC  
Subject: Docket No. 50-482: Response to Request for Additional  
Information on the Proposed Conversion to the Improved  
Standard Technical Specifications, Section 3.7

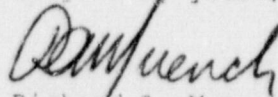
Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOG) requested an amendment to the Wolf Creek Generating Station (WCGS) Unit 1 facility operating license (NPP-42) by incorporating changes to the WCGS Technical Specifications (TS) as provided in Reference 2. The NRC staff requested additional information regarding Section 3.7, "Plant Systems," of the proposed TS changes in Reference 1. Also included are additional changes needed for Section 3.7 as identified by WCNOG.

This letter and Enclosure are not a supplement to Reference 2 and have not been reviewed by the Plant Safety Review Committee or Nuclear Safety Review Committee. A supplement to Reference 2 will be provided at a later date.

If you have any questions concerning this response, please contact me at (316) 364-4034, or Mr. Michael J. Angus, 316-364-4077.

Very truly yours,

  
Richard A. Muench

Attachments  
Enclosure

RAM/rlr

cc: W. D. Johnson (NRC), w/a  
E. W. Merschoff (NRC), w/a  
B. A. Smalldridge (NRC), w/a  
K. M. Thomas (NRC), w/a

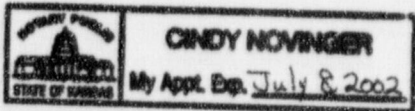
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STATE OF KANSAS     )  
                              )   SS  
COUNTY OF COFFEY    )

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*  
Richard A. Muench  
Vice President  
Engineering

SUBSCRIBED and sworn to before me this 16<sup>th</sup> day of October, 1998.



*Cindy Novinger*  
Notary Public

Expiration Date July 8, 2002

**JLS CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS**

**CTS 3/4.7 - PLANT SYSTEMS**

**ITS 3.7 - PLANT SYSTEMS**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND LICENSEE INITIATED  
ADDITIONAL CHANGES**



## INDEX OF ADDITIONAL INFORMATION

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.G-1	DC, CP, WC, CA	YES
3.7.1-1	DC, CP, WC, CA	YES
3.7.1-2	CP	NA
3.7.1-3	DC	NA
3.7.1-4	DC, CP, WC, CA	YES
3.7.1-5	DC, CP, WC, CA	YES
3.7.1-6	WC	YES
3.7.1-7	DC, CP, WC, CA	YES
3.7.1-8	WC, CA	YES
3.7.1-9	DC	NA
3.7.1-10	DC	NA
3.7.2-1	CP, WC, CA	YES
3.7.2-2	WC, CA	YES
3.7.2-3	DC, CP, WC, CA	YES
3.7.2-4	CP	NA
3.7.3-1	DC	NA
3.7.3-2	CP	NA
3.7.3-3	DC, CP, WC, CA	YES
3.7.3-4	WC, CA	YES
3.7.3-5	DC	NA
3.7.3-6	CP	NA
3.7.4-1	DC, CP	NA
3.7.4-2	DC	NA
3.7.4-3	DC	NA
3.7.4-4	WC, CA	YES
3.7.4-5	CP, WC, CA	YES
3.7.4-6	CP, CA	NA
3.7.4-7	CP, WC, CA	YES
3.7.4-8	CP	NA
3.7.4-9	CP	NA
3.7.5-1	CP	NA
3.7.5-2	WC, CA	YES
3.7.5-3	CA	NA
3.7.5-4	WC, CA	YES
3.7.5-5	CP	NA
3.7.5-6	CP, WC, CA	YES
3.7.5-7	CP, WC, CA	YES
3.7.5-8	DC, CP	NA
3.7.5-9	DC, CP, WC, CA	YES
3.7.5-10	DC, CP	NA
3.7.5-11	DC	NA
3.7.5-12	DC	NA
3.7.6-1	WC	YES
3.7.6-2	CP, WC, CA	YES
3.7.6-3	CP	NA

**INDEX OF ADDITIONAL INFORMATION  
(cont)**

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.6-4	WC, CA	YES
3.7.6-5	CP	NA
3.7.6-6	CA	NA
3.7.6-7	DC	NA
3.7.7-1	WC, CA	YES
3.7.7-2	DC, CP, WC, CA	YES
3.7.7-3	WC, CA	YES
3.7.7-4	CP	YES
3.7.7-5	DC	NA
3.7.7-6	DC	NA
3.7.8-1	CP	NA
3.7.8-2	CP	NA
3.7.8-3	CP	NA
3.7.8-4	CP	NA
3.7.8-5	CP	NA
3.7.8-6	DC	NA
3.7.8-7	DC	NA
3.7.8-8	DC	NA
3.7.8-9	DC	NA
3.7.8-10	DC	NA
3.7.8-11	WC, CA	YES
3.7.8-12	WC, CA	YES
3.7.8-13	WC	YES
3.7.8-14	WC, CA	YES
3.7.8-15	WC, CA	YES
3.7.8-16	CA	NA
3.7.8-17	CA	NA
3.7.9-1	DC	NA
3.7.9-2	DC	NA
3.7.9-3	CP	NA
3.7.9-4	CP	NA
3.7.9-5	WC	YES
3.7.9-6	CA	NA
3.7.9-7	CA	NA
3.7.9-8	CA	NA
3.7.10-1	DC	NA
3.7.10-2	DC	NA
3.7.10-3	DC	NA
3.7.10-4	DC, WC, CA	YES
3.7.10-5	DC	NA
3.7.10-6	DC	NA
3.7.10-7	DC, WC, CA	YES
3.7.10-8	DC, WC, CA	YES
3.7.10-9	DC, CP, WC, CA	YES

INDEX OF ADDITIONAL INFORMATION  
(cont)

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.10-10	DC	NA
3.7.10-11	CP	NA
3.7.10-12	DC	NA
3.7.10-13	CA	NA
3.7.10-14	WC, CA, CP	YES
3.7.10-15	WC, CA	YES
3.7.10-16	WC, CA	YES
3.7.10-17	WC, CA	YES
3.7.10-18	DC, WC, CA	YES
3.7.10-19	CP, WC, CA	YES
3.7.11-1	CP	NA
3.7.12.1-1	DC	NA
3.7.12.1-2	DC	NA
3.7.12.1-3	DC	NA
3.7.12.1-4	DC	NA
3.7.12.1-5	DC	NA
3.7.12.1-6	DC	NA
3.7.13.1-1	DC	NA
3.7.13.1-2	DC	NA
3.7.13.1-3	DC	NA
3.7.13.1-4	DC	NA
3.7.13.1-5	DC	NA
3.7.13.1-6	DC	NA
3.7.13.1-7	DC	NA
3.7.13.1-8	DC	NA
3.7.13.2-1	WC, CA	YES
3.7.13.2-2	WC, CA	YES
3.7.13.2-3	WC, CA	YES
3.7.13.2-4	WC, CA	YES
3.7.13.2-5	CA	NA
3.7.13.2-7	WC, CA	YES
3.7.13.2-8	WC, CA	YES
3.7.13.2-9	WC, CA	YES
3.7.13.2-10	WC, CA	YES
3.7.15-1	DC, CP, WC, CA	YES
3.7.15-2	WC, CA	YES
3.7.15-3	CP	NA
3.7.16-1	DC	NA
3.7.16-2	DC	NA
3.7.16-3	CP, WC, CA	YES
3.7.17.1-1	WC, CA	YES
3.7.17.1-2	CP, WC, CA	YES
3.7.17.1-3	WC, CA	YES
3.7.17.1-4	WC, CA	YES

**INDEX OF ADDITIONAL INFORMATION  
(cont)**

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.17.1-5	WC, CA	YES
3.7.17.1-6	WC, CA	YES
3.7.17.1-7	CP	NA
3.7.17.2-1	DC	NA
3.7.17.2-2	DC	NA
3.7.17.2-3	DC	NA
3.7.17.2-4	DC	NA
3.7.17.2-5	DC	NA
3.7.17.3-1	DC	NA
3.7.17.3-2	DC	NA
3.7.17.3-3	DC	NA
3.7.17.3-4	DC	NA
3.7.17.3-5	DC	NA
3.7.17.3-6	DC	NA
3.7.18-1	CP	NA
3.7.19-1	CP	NA
3.7.19-2	CP	NA
3.7.19-3	CP	NA
3.7.19-4	CP	NA
3.7.19-5	CP	NA
3.7.20-1	CP	NA
3.7.20-2	CP	NA
3.7.20-3	CP	NA
3.7.20-4	CP	NA
3.7.20-5	CP	NA
3.7.20-6	CP	NA
3.7 R DOCs	DC, CP, WC, CA	YES
TR 3.7-001	DC, CP, WC, CA	YES
TR 3.7-002	DC, CP, WC, CA	YES
TR 3.7-005	DC, CP, WC, CA	YES
CA 3.7-ED	CA	NA
CA 3.7-003	CA	NA
CA 3.7-004	CA	NA
CA 3.7-005	CA	NA
CA 3.7-008	CA	NA
CA 3.7-009	CA	NA
CP 3.7-ED	CP	NA
CP 3.7-004	CP	NA
CP 3.7-005	CP	NA
CP 3.7-008	CP, WC, CA	YES
CP 3.7-009	CP, WC, CA	YES
CP 3.7-012	CP	NA



INDEX OF ADDITIONAL INFORMATION  
(cont)

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
CP 3.7-013	CP	NA
CP 3.7-014	CP	NA
CP 3.7-015	CP	NA
DC 3.7-ED	DC	NA
DC ALL-001 (3.7 changes only)	DC	NA
DC ALL-002 (3.7 changes only)	DC	NA
DC ALL-003 (3.7 changes only)	DC	NA
DC 3.7-008	DC	NA
DC 3.7-009	DC	NA
DC 3.7-010	DC	NA
WC 3.7-001	WC	YES
WC 3.7-002	WC	YES
WC 3.7-003	WC	YES
WC 3.7-004	WC	YES
WC 3.7-005	WC	YES
WC 3.7-006	WC	YES
WC 3.7-007	WC	YES
WC 3.7-008	WC	YES



### JOINT LICENSING SUBCOMMITTEE METHODOLOGY FOR PROVIDING ADDITIONAL INFORMATION

The following methodology is followed for submitting additional information:

1. Each licensee is submitting a separate response for each section.
2. If an RAI does not apply to a licensee (i.e., does not actually impact the information that defines the technical specification change for that licensee), "NA" has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
3. If a licensee initiated change does not apply, "NA" has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
4. The common portions of the "Additional Information Cover Sheets" are identical, except for brackets, where applicable (using the same methodology used in enclosures 3A, 3B, 4, 6A and 6B of the conversion submittals). The list of attached pages will vary to match the licensee specific conversion submittals. A licensee's FLOG response may not address all applicable plants if there is insufficient similarity in the plant specific responses to justify their inclusion in each submittal. In those cases, the response will be prefaced with a heading such as "PLANT SPECIFIC DISCUSSION."
5. Changes are indicated using the redline/strikeout tool of WordPerfect or by using a hand markup that indicates insertions and deletions. If the area being revised is not clear, the affected portion of the page is circled. The markup techniques vary as necessary, based on the specifics of the area being changed and the complexity of the changes, to provide the clearest possible indication of the changes.
6. A marginal note (the Additional Information Number from the index) is added in the right margin of each page being changed, adjacent to the area being changed, to identify the source of each change.
7. Some changes are not applicable to one licensee but still require changes to the Tables provided in Enclosures 3A, 3B, 4, 6A, and 6B of the original license amendment request to reflect the changes being made by one or more of the other licensees. These changes are not included in the additional information for the licensee to which the change does not apply, as the changes are only for consistency, do not technically affect the request for that licensee, and are being provided in the additional information being provided by the licensees for which the change is applicable. The complete set of changes for the license amendment request will be provided in a licensing amendment request supplement to be provided later.

**JOINT LICENSING SUBCOMMITTEE METHODOLOGY FOR  
PROVIDING ADDITIONAL INFORMATION**  
(continued)

8. The item numbers are formatted as follows:

[Source] [ITS Section]-[nnn]

Source =           Q - NRC Question  
                      CA - AmerenUE  
                      DC - PG&E  
                      WC - WCNOC  
                      CP - TU Electric  
                      TR - Traveler

ITS Section = The ITS section associated with the item (e.g., 3.3). If all sections are potentially impacted by a broad change or set of changes, "ALL" is used for the section number.

nnn = a three digit sequential number

## ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q 3.7.G-1

APPLICABILITY: DC, CP, WC, CA

REQUEST: ITS 3.7.X Bases

General

There have been a number of instances that the specific changes to the STS Bases are not properly identified with redline or strikeout marks.

**Comment:** Perform an audit of all STS Bases markups and identify instances where additions and/or deletions of Bases were not properly identified in the original submittal.

**FLOG RESPONSE:** The submitted ITS Bases markups for Section 3.7 have been compared to the STS Bases. Some differences that were identified were in accordance with the markup methodologies (e.g., deletion of brackets and reviewer's notes). Most of the differences were editorial in nature and would not have affected the review. Examples of editorial changes are:

- 1) Capitalizing a letter with only a "redline" but not striking out the lower case letter that it replaced.
- 2) Changing a verb from singular to plural by adding an "s" without "redlining" the "s".
- 3) Deleting instead of striking-out the A, B, C,... etc. following a specification title (e.g., SR3.6.6A.7).
- 4) Changing a bracketed reference (in the reference section) with only a "redline" for the new reference but failing to include the strike-out of the old reference.
- 5) In some instances the brackets were retained (and struck-out) but the unchanged text within the brackets was not redlined.
- 6) Not redlining a title of a bracketed section. The methodology calls for the section title to be redlined when an entire section was bracketed.
- 7) Additional text not contained in the STS Bases was added to the ITS Bases by the lead FLOG member during the development of the submittal. Once it was determined to not be applicable, the text was then struck-out and remains in the ITS Bases mark-up.

Differences of the above editorial nature will not be provided as attachments to this response. The pages requiring changes that are more than editorial and are not consistent with the markup methodology are attached.

### ATTACHED PAGES:

Encl. 5B      B 3.7-30, B 3.7-33, B 3.7-38, B 3.7-60, B 3.7-62, B 3.7-64, B 3.7-65, B 3.7-68,  
B 3.7-86