



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

March 27, 1986

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

KMLNRC 86-054
Re: Docket No. STN 50-482
Subj: Revision to Technical Specification 4.7.8

Dear Mr. Denton:

The purpose of this letter is to transmit three original and 40 conformed copies of an application for Amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station, Unit No. 1.

This application requests that the Wolf Creek Generating Station, (WOGS) Unit No. 1 Technical Specifications, be revised to allow a deferment of the inservice visual inspection of safety related and special scope inaccessible snubbers. The determination of accessibility is based upon the existing radiation levels and the expected time to perform a visual inspection as well as other factors during plant operations (temperature, atmosphere, location). In order to perform these inspections on inaccessible snubbers, the plant must be in at least Mode 2 (STARTUP) due to ALARA considerations. The proposed change to the Technical Specifications is provided as Attachment III.

Section 4.7.8.b requires the first inservice visual inspection to be performed after 4 months but within 10 months of POWER OPERATION for both inaccessible and accessible snubbers. The first refueling outage (Refuel 1) is the next scheduled shutdown and is currently scheduled to begin in October, 1986. In the event of any unanticipated delays in the refueling schedule a unit shutdown to perform these inspections will be initiated by October 31, 1986. Therefore this request entails an approximate four month extension of the existing surveillance requirements. If an unscheduled shutdown of sufficient duration and resulting in appropriate plant conditions, as specified above, occurs prior to Refuel 1, Kansas Gas and Electric Company (KG&E) will perform all inspections that can be completed. Without the requested revision Wolf Creek Generating Station would be forced into an outage for the sole purpose of inspecting inaccessible snubbers.

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*A047 w/check \$150.00
3/40 # 2171*

March 27, 1986

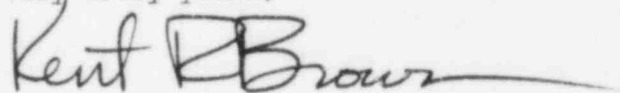
KG&E desires to keep Wolf Creek Generating Station on line to support system power needs until Refuel 1. Temporary deferment of these tests will allow KC&E to take Wolf Creek Generating Station off-line at a time consistent with system need for power and the Wolf Creek Generating Station Owner's overall program of power management.

The requested revision would not have a significant impact on safe operations of the plant when compared to the transient associated with a shutdown for the purpose of performing this surveillance. A complete Safety Evaluation and Significant Hazards Consideration are provided as Attachment I and II respectively.

In accordance with 10 CFR 50.91, a copy of this application, with Attachments, is being provided to the designated Kansas State Official. Enclosed is a check (No. 2171) for the \$150.00 application fee required by 10 CFR 170.21.

If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,


for Glenn L. Koester
Vice President - Nuclear

GIK:see

Enclosure

Attachments: I-Safety Evaluation
II-Significant Hazards Consideration
III-Proposed Technical Specification Change

cc: PO'Connor (2), w/a
JCummins, w/a
Gallen, w/a
EJohnson, w/a

OATH OF AFFIRMATION

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

I, Kent R. Brown, of lawful age, being duly sworn upon oath, do depose, state and affirm that I am Group Vice President - Technical Services of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal for Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, know the contents thereof, and that all statements contained therein are true.

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:

[Signature]

By *Kent R Brown*
Kent R. Brown
Group Vice President - Technical Services

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

BE IT REMEMBERED, that on this 27th day of March, before me, Kent R. Brown, a Notary, personally appeared Kent R. Brown, Group Vice President - Technical Services of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on behalf of and as the act and deed of said Corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the date and year above written.

Evelyn L. Fry Notary



My Commission expires August 15, 1989

ATTACHMENT 1

SAFETY EVALUATION

This application requests a revision to the Wolf Creek Generating Station, Unit No. 1, Technical Specifications Section 4.7.8.b to allow a deferral of the first inservice visual inspection of safety related inaccessible snubbers until the first refueling outage (Refuel 1). The determination of accessibility is based upon the existing radiation levels and the expected time to perform a visual inspection as well as other factors during plant operations (temperature, atmosphere, location). Due to ALARA considerations, the inspection of inaccessible snubbers at POWER OPERATION is undesirable and not consistent with KG&E's ALARA program. The proposed change to the Technical Specifications is provided as Attachment III.

Section 4.7.8.b requires the first inservice visual inspection to be performed after 4 months but within 10 months of POWER OPERATION for both inaccessible and accessible snubbers. Refuel 1 is the next scheduled shutdown and is currently scheduled to begin in October, 1986. In the event of any unanticipated delays in the refueling schedule a unit shutdown to perform these inspections will be initiated by October 31, 1986. Therefore this request entails an approximate four month extension of the existing surveillance requirement. If an unscheduled shutdown of sufficient duration and resulting in appropriate plant conditions, as specified above, occurs prior to Refuel 1, Kansas Gas and Electric Company (KG&E) will perform all inspections that can be completed. Without the requested revision Wolf Creek Generating Station would be forced into an outage for the sole purpose of inspecting inaccessible snubbers.

There are approximately 1210 safety related and special scope snubbers installed at Wolf Creek Generating Station. Of these, approximately 780 are classified as accessible and approximately 430 are classified as inaccessible. Approximately 480 of the 780 accessible snubbers have been inspected and the remaining accessible snubbers will be inspected prior to the required due date associated with the surveillance. Of the 430 inaccessible snubbers, approximately 300 have been inspected within the inspection period leaving approximately 130 snubbers. This Technical Specification revision would defer the visual inspection of these 130 inaccessible snubbers which is 11 percent of the 1210 snubbers at Wolf Creek Generating Station. All snubbers inspected to date have been found to be OPERABLE with no evidence of any significant degradation.

	<u>Inaccessible Snubbers</u>	<u>Accessible Snubbers</u>	<u>All Snubbers</u>
Snubbers That Have Been Inspected And Found Acceptable	300	480	780
<u>Snubbers That Have Not Been Inspected</u>	<u>130</u>	<u>300¹</u>	<u>430</u>
Total Number	430	780	1210

1 These snubbers will be inspected prior to the due date associated with surveillance.

Within the four to ten month period of the snubber inspection period Wolf Creek Generating Station has operated in Mode 1 (POWER OPERATION) for the whole period except for 79 hours early in the fourth month and for 57.3 hours in February when the 300 inaccessible snubber assemblies were visually inspected. In early October, 1985, no snubbers were inspected during two outages totaling 79 hours because at that time Kansas Gas & Electric believed there would be other outages with sufficient time to complete the snubber inspections. However, with the exemplary operating history of Wolf Creek Generating Station there has not been sufficient time at acceptable conditions to complete inspections of all inaccessible snubbers. Kansas Gas and Electric will take advantage of any unplanned reactor trips between now and the first refueling outage to accomplish as many inspections of inaccessible snubbers as possible.

Wolf Creek Generating Station utilizes only mechanical snubbers with the exception of 16 large bore hydraulic snubbers used in conjunction with its four steam generators. Mechanical snubbers are of the same type but vary in regard to size, environment, and loading. All mechanical snubbers at Wolf Creek Generating Station were manufactured by Pacific Scientific and the hydraulic snubbers were manufactured by Paul Munroe.

Prior to initial installation in the power block, each snubber was visually inspected and mechanically tested to ensure their operability prior to installation. The mechanical portion of this test consisted in part of an acceleration test and a drag force test. Snubber assemblies were not actually installed in the power block until approximately one year prior to Hot Functional Testing. This served to preclude unnecessary exposure of the snubber assemblies to the construction environment present prior to this time. During installation snubber assemblies were verified to have the correct pin-to-pin dimensions and appropriate swing clearance. A manual stroke test was also performed and verified.

Subsequent to installation, system walkdowns were performed by the constructor, KG&E, and the Architect/Engineer to verify correct installation and appropriate configuration. Additionally, approximately 40 percent of the snubber assemblies were inspected to fulfill preservice inspection program requirements. Inspections were also performed during Hot Functional Testing and unit startup to assure snubber operability was not adversely affected by normal thermal expansion. The aforementioned comprehensive preservice testing and inspection program ensured that the snubber assemblies at Wolf Creek Generating Station were fully operational prior to the beginning of Commercial Operation.

In early September 1985, approximately three months after initial Power Operation at Wolf Creek Generating Station, 238 snubbers were inspected by KG&E personnel to determine if any snubber assemblies were damaged during construction or unit startup. Although one snubber was found to be improperly oriented, no other anomalies were identified. The anomalous snubber was reoriented and all 238 snubber assemblies were determined to be fully operable.

Since initially entering Mode 3 (HOT STANDBY) on April 26, 1985, the Unit has not reentered Mode 4 (HOT SHUTDOWN). Wolf Creek Generating Station commenced POWER OPERATION on June 6, 1985. Although Wolf Creek Generating Station has experienced four inadvertent safety injections since initially loading fuel, its overall operating history has been exemplary for a first cycle unit, including a continuous run of 134 days. The good performance of the unit has served to minimize the number of cyclical loadings experienced by the snubber assemblies.

After a Unit trip on February 22, 1986, approximately 320 snubber assemblies inside containment were inspected. The majority of these had been categorized as inaccessible during POWER OPERATION. All inspected snubber assemblies were determined to be operable. One of the steam generator hydraulic snubbers was observed to be leaking some fluid, however, this did not impair its operability. The fluid reservoir level for this snubber is being monitored to assure its continued operability.

Since inspections of 64 percent of all safety related and special scope snubber assemblies and 70 percent of all inaccessible snubber assemblies confirmed that all inspected snubbers were visually acceptable and considered operable, it is probable that no inoperable snubbers will be identified during inspections of the remaining inaccessible snubbers. In addition, a four month extension of the existing surveillance requirement, during a period of continuous POWER OPERATION, is unlikely to have any effect on snubber assembly operability.

Technical Specifications require a visual inspection of all snubbers between four and ten months after initial POWER OPERATION. This requirement ensures that installed snubbers remain undamaged and in the appropriate configuration after plant thermal cycles, normally present during the early phases of Cycle 1 operation, have occurred. It further serves to provide baseline information upon which future visual snubber assembly testing intervals can be established as provided in Technical Specifications. Since 70 percent of all inaccessible snubber assemblies have successfully passed an initial visual inspection, it is expected that any inaccessible snubber assemblies not yet inspected are fully capable of performing their design function as assumed in the FSAR accident analyses. Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident over previous evaluations.

The proposed amendment does not involve hardware modifications, introduces no new systems, modes of operation, failure modes or other plant perturbations. There is a high level of assurance of snubber assembly operability, since during inspections of 64 percent of all installed safety related and special scope snubber assemblies all snubber assemblies passed the surveillance and were determined to be operable. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident over previous evaluations.

The requested amendment merely extends an existing surveillance interval to allow continued POWER OPERATION until Refuel 1. During periods of continuous operation at power, minimal cyclical wear of snubber assemblies occurs. The inspections performed to date indicate that the installed snubber assemblies have performed in a wholly satisfactory manner and can be expected to maintain that level of performance. Thus the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above analysis, the proposed revision to the Wolf Creek Generating Station, Unit No. 1, Technical Specifications does not adversely affect or endanger the health or safety of the general public or involve an unreviewed safety question.

ATTACHMENT II

SIGNIFICANT HAZARDS CONSIDERATION

This application requests a revision to the Wolf Creek Generating Station, Unit No. 1, Technical Specifications Section 4.7.8.b to allow a deferment of the first inservice visual inspection of safety related inaccessible snubbers until the first refueling outage (Refuel 1). The determination of accessibility is based upon the existing radiation levels and the expected time to perform a visual inspection as well as other factors during plant operations (temperature, atmosphere, location). Due to ALARA considerations, the inspection of inaccessible snubbers at POWER OPERATION is undesirable and not consistent with KG&E's ALARA program. The proposed change to the Technical Specifications is provided as Attachment III.

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Technical Specifications require a visual inspection of all snubbers between four and ten months after initial POWER OPERATION. This requirement ensures that installed snubbers remain undamaged and in the appropriate configuration after plant thermal cycles, normally present during the early phases of Cycle 1 operation, have occurred. It further serves to provide baseline information upon which future visual snubber assembly testing intervals can be established as provided in Technical Specifications. Since 70 percent of all inaccessible snubber assemblies have successfully passed an initial visual inspection, it is expected that any inaccessible snubber assemblies not yet inspected are fully capable of performing their design function as assumed in the FSAR accident analyses. Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident over previous evaluations.

The proposed amendment does not involve hardware modifications, introduces no new systems, modes of operation, failure modes or other plant perturbations. There is a high level of assurance of snubber assembly operability, since during inspections of 64 percent of all installed safety related and special scope snubber assemblies all snubber assemblies passed the surveillance and were determined to be operable. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident over previous evaluations.

The requested amendment merely extends an existing surveillance interval to allow continued POWER OPERATION until Refuel 1. During periods of continuous operation at power, minimal cyclical wear of snubber assemblies occurs. The inspections performed to date indicate that the installed snubber assemblies have performed in a wholly satisfactory manner and can be expected to maintain that level of performance. Thus the proposed amendment does not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing examples of amendments that are not likely to involve Significant Hazards Considerations (48 FR 14870). Among these examples is, "A change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan:" The proposed license amendment fits this example in that it reflects a four month extension of a visual surveillance requirement used to gather and establish baseline information on snubber assembly performance.

Based on the above analysis and the guidance provided by the Commission, 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 evaluation; or involve a significant reduction in a margin of safety. Therefore the requested license amendment does not present a significant hazard.

ATTACHMENT III