



KANSAS GAS AND ELECTRIC COMPANY

July 29, 1986

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

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

KMLNRC 86-133
Re: Docket No. STN 50-482
Ref: 1)KMLNRC 86-037 dated 3/4/86, from GLKoester, KG&E,
to HRDenton, NRC
2)KMLNRC 86-065 dated 4/15/86, from GLKoester, KG&E,
to HRDenton, NRC
Subj: Supplemental Information Regarding Revision to
Technical Specification Sections 6.2 and 6.5.2

Dear Mr. Denton:

The purpose of this letter is to supplement information originally provided in the References. The attachments to this letter describe supplemental proposed revisions to Technical Specification Figure 6.2-1 and Section 6.5.2.2.

The proposed changes to the Technical Specifications are provided in Attachment III. A complete Safety Evaluation and Significant Hazards Consideration are provided as Attachments I and II respectively. If you have any questions concerning this matter please contact me or Mr. O. L. Maynard of my staff.

Yours very truly,

Glenn L. Koester
Vice President - Nuclear

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Attachment: I - Safety Evaluation
II - Significant Hazards Considerations
III - Proposed Technical Specification Changes

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ATTACHMENT I

SIGNIFICANT HAZARDS CONSIDERATION

This amendment request supplements submittals dated March 4, 1986 and April 15, 1986 (KMLNRC 86-037 and KMLNRC 86-065) concerning Wolf Creek Generating Station, Unit No. 1, Technical Specification Figure 6.2-1, Figure 6.2-2, Section 6.5.2.2 and various changes resulting from the formation of the Wolf Creek Nuclear Operating Corporation. This supplement encompasses a title change and addition of a position to the Offsite Organization (Figure 6.2-1), an addition to the membership of the Nuclear Safety Review Committee as well as changes resulting from a reorganization of a portion of the Quality Branch.

The first requested revision changes the title Manager Construction, proposed Operating Corporation Organization (Figure 6.2-1), to Manager Facilities and Modifications. This constitutes an administrative change that does not involve a change in reporting relationships or organizational commitments and responsibilities.

The second revision results from a change in reporting relationship. The Manager Licensing is being added to Figure 6.2-1, reporting to the Director* Engineering & Technical Services. The Manager Licensing formerly reported to the Manager Nuclear Services, who reports to the Director* Engineering & Technical Services. This change represents an organizational enhancement by altering reporting relationships and does not constitute a change in job responsibilities or overall organizational commitments.

Section 6.5.2.2 is being revised to add an additional member to the Nuclear Safety Review Committee and reflect the reorganization of a portion of the Quality Branch. The Nuclear Safety Review Committee (NSRC) membership is being revised to add the position Nuclear Coordinator. This is an additional position on the NSRC and as such does not reduce the level of expertise within the NSRC. Additionally the Manager Quality Assurance (Home Office) is being replaced by the Manager Quality Assurance. The Manager Quality Assurance is a new position resulting from a reorganization, as described below, of a portion of the Quality Branch. The Manager Quality Assurance was formerly the Manager Quality Assurance (WCGS) and has extensive experience in the field of quality and the nuclear industry. The requested revisions to the NSRC membership do not reduce the level of expertise represented in the NSRC since the same technical and management responsibilities are still embodied.

The final two changes revise Figure 6.2-1 to reflect organizational changes within a portion of the Quality Branch. The Manager Quality Assurance (Home Office) previously had both quality assurance personnel and supplier quality personnel reporting to him. The previous Manager Quality Assurance (Home Office) was recently promoted to Manager Electrical Engineering. Concurrent with this change, a new position, Manager Supplier Quality was created. The Manager Supplier Quality reports directly to the Director* Quality. Quality assurance personnel, who previously reported to the Manager Quality Assurance (Home Office), report to the Manager Quality Assurance. The Manager Quality Assurance (Home Office) position has been eliminated.

* When used in conjunction with the proposed Wolf Creek Nuclear Operating Corporation this position should be titled Vice President rather than Director.

The title Manager Quality Assurance (WCGS) is changed to Manager Quality Assurance. This reorganization will result in an overall enhancement of organization effectiveness by consolidating all personnel of each Quality discipline under the same manager. There has been no change in overall organizational commitments of the Quality Branch.

The proposed revisions do 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. These changes involve organizational enhancements and, as such, have no effect on plant equipment or the technical qualifications of plant personnel.

The proposed revisions do not create the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report. These changes do not affect the overall number or qualifications of personnel who operate Wolf Creek Generating Station, nor do they involve any change to installed plant systems or the overall operating philosophy of Wolf Creek Generating Station.

The proposed revisions do not reduce the margin of safety as defined in the basis for any technical specification. These changes do not involve any changes in overall organizational commitments or individual job responsibilities. Organizational modifications alone do not reduce any margin of safety.

Based on the above analysis, the proposed revisions to the WCGS Technical Specifications do not involve an unreviewed safety question.

ATTACHMENT II

SAFETY EVALUATION

This amendment request supplements submittals dated March 4, 1986 and April 15, 1986 (KMLNRC 86-037 and KMLNRC 86-065) concerning Wolf Creek Generating Station, Unit No. 1, Technical Specification Figure 6.2-1, Figure 6.2-2, Section 6.5.2.2 and various changes resulting from the formation of the Wolf Creek Nuclear Operating Corporation. This supplement encompasses a title change and addition of a position to the Offsite Organization (Figure 6.2-1), an addition to the membership of the Nuclear Safety Review Committee as well as changes resulting from a reorganization of a portion of the Quality Branch.

The first requested revision changes the title Manager Construction, proposed Operating Corporation Organization (Figure 6.2-1), to Manager Facilities and Modifications. This constitutes an administrative change that does not involve a change in reporting relationships or organizational commitments and responsibilities.

The second revision results from a change in reporting relationship. The Manager Licensing is being added to Figure 6.2-1, reporting to the Director* Engineering & Technical Services. The Manager Licensing formerly reported to the Manager Nuclear Services, who reports to the Director* Engineering & Technical Services. This change represents an organizational enhancement by altering reporting relationships and does not constitute a change in job responsibilities or overall organizational commitments.

Section 6.5.2.2 is being revised to add an additional member to the Nuclear Safety Review Committee and reflect the reorganization of a portion of the Quality Branch. The Nuclear Safety Review Committee (NSRC) membership is being revised to add the position Nuclear Coordinator. This is an additional position on the NSRC and as such does not reduce the level of expertise within the NSRC. Additionally the Manager Quality Assurance (Home Office) is being replaced by the Manager Quality Assurance. The Manager Quality Assurance is a new position resulting from a reorganization, as described below, of a portion of the Quality Branch. The Manager Quality Assurance was formerly the Manager Quality Assurance (WCGS) and has extensive experience in the field of quality and the nuclear industry. The requested revisions to the NSRC membership do not reduce the level of expertise represented in the NSRC since the same technical and management responsibilities are still embodied.

The final two changes revise Figure 6.2-1 to reflect organizational changes within a portion of the Quality Branch. The Manager Quality Assurance (Home Office) previously had both quality assurance personnel and supplier quality personnel reporting to him. The previous Manager Quality Assurance (Home Office) was recently promoted to Manager Electrical Engineering. Concurrent with this change, a new position, Manager Supplier Quality was created. The Manager of Supplier Quality reports directly to the Director* Quality. Quality Assurance personnel who previously reported to the Manager Quality Assurance (Home Office) report to the Manager Quality Assurance. The Manager Quality Assurance (Home Office) position has been eliminated.

* When used in conjunction with the proposed Wolf Creek Nuclear Operating Corporation this position should be titled Vice President rather than Director.

The title Manager Quality Assurance (WCGS) is changed to Manager Quality Assurance. This reorganization will result in an overall enhancement of organization effectiveness by consolidating all personnel of each Quality discipline under the same manager. There has been no change in overall organizational commitments of the Quality Branch.

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 those examples are, "A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the Technical Specifications, corrections of an error, or a change in nomenclature" and "A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications . . .".

The proposed revisions do not involve a significant increase in the probability or consequences of an accident previously evaluated. These changes involve organizational modifications and enhancements and, as such, have no effect on plant equipment or the technical qualifications of plant personnel.

The proposed revisions do not create the possibility of a new or different kind of accident from any accident previously evaluated. These changes do not affect the overall number or qualifications of personnel who operate Wolf Creek Generating Station, nor do they involve any change to installed plant systems or the overall operating philosophy of Wolf Creek Generating Station.

The purposed revisions do not involve a significant reduction in a margin of safety. These changes do not involve any changes in overall organizational commitments or individual job responsibilities. Organizational modifications alone do not reduce any margin of safety.

Based on the above analysis and utilizing the guidance provided by the Commission, it has been concluded that the proposed revisions to the Wolf Creek Generating Station Technical Specifications involve no significant hazards considerations.

ATTACHMENT III