

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Engineering and Technical Services

September 17, 1987

ET 87-5292

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Docket No. 50-482: Revision to Technical Specification
Figure 6.2-1 - Operating Corporation Organization

Gentlemen:

The purpose of this letter is to transmit an application for amendment to Facility Operating License No. NPF-42 for Wolf Creek Generating Station, Unit No. 1. This license amendment request proposes revising Technical Specification Figure 6.2-1, which addresses the Operating Corporation Organization.

This application for amendment revises Technical Specification Figure 6.2-1, to reflect the removal of the Manager Nuclear Operations Support position and the name change of the Procurement and Materials Management division in the Operating Corporation Organization, as well as the removal of unnecessary detail from Figure 6.2-1.

A complete Safety Evaluation and Significant Hazards Consideration are provided as Attachments I and II respectively. The proposed changes to the Technical Specifications are provided in Attachment III.

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.000205) for the \$150.00 application fee required by 10 CFR 170.21.

The proposed revision to the Wolf Creek Generating Station Technical Specifications will be fully implemented within 30 days of formal Nuclear Regulatory Commission approval.

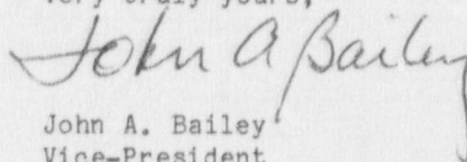
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If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,



John A. Bailey
Vice-President
Engineering & Technical Services

JAB/jad

Enclosure

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

cc: P. O'Connor (2)
R. Martin
J. Cummins
G. Allen

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

John A. Bailey, of lawful age, being first duly sworn upon oath says that he is Vice-President Engineering and Technical Services 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 John A. Bailey
John A. Bailey
Vice-President Engineering and
Technical Services

SUBSCRIBED and sworn to before me this 17 day of Sept., 1987.



Marlin Beachman
Notary Public

Expiration Date August 4, 1990

ATTACHMENT I

SAFETY EVALUATION

SAFETY EVALUATION

This amendment request revises Wolf Creek Generating Station WCGS, Unit No. 1, Technical Specification Figure 6.2-1, which addresses the Operating Corporation Organization.

The first revision removes the Nuclear Operations Support division from the Operating Corporation Organization. The transfer of the various functions of the Nuclear Operations Support division to other divisions within the Vice President Nuclear Operations organization increases organizational effectiveness by establishing managerial control at the plant site. The elimination of the support group's identity is therefore an organizational enhancement, and as such, has no effect on plant equipment or the technical qualifications of plant personnel.

The transfer of the management supervisor (Manager Nuclear Operations Support) of the Industry Technical Information Program (ITIP) within the organization of the Vice President Nuclear Operations to a manager located on-site instead of off-site increases the effectiveness of the ITIP program.

The second revision renames the Procurement & Materials Management division to the Purchasing & Material Services division. The Manager Purchasing & Material Services, previously reporting to the Vice President Nuclear Operations, reports to the President and Chief Executive Officer. This change in reporting relationship increases the overall effectiveness of this division. The title change is only a revision of nomenclature and does not represent a change in job responsibilities or overall organizational commitments.

The third revision removes the wording "Chairman of the Board" and "Vice Chairman of the Board" from the block representing the Board of Directors in Figure 6.2-1. This change removes unnecessary detail from Figure 6.2-1 and does not represent any change in job responsibilities or overall organizational commitments.

The proposed revisions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety evaluated previously evaluated in the Safety Analysis Report. These changes involve only organizational enhancements and therefore 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 involve revising nomenclature and reporting relationships and as such, do not affect the overall number or qualifications of personnel who operate Wolf Creek Generating Station, nor do they involve any changes to 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 revisions do not involve any changes in overall organizational commitments or individual job responsibilities. Organizational enhancements alone do not reduce any margin of safety.

Based on the discussions and considerations presented above, the proposed revisions to the Wolf Creek Generating Station Technical Specifications do not involve an unreviewed safety question.

ATTACHMENT II

SIGNIFICANT HAZARDS CONSIDERATION

SIGNIFICANT HAZARDS CONSIDERATION

This amendment request revises Wolf Creek Generating Station (WCGS), Unit No. 1, Technical Specification Figure 6.2-1, which addresses the Operating Corporation Organization.

The transfer of the various functions of the Nuclear Operations Support division to other divisions within the Vice President Nuclear Operations organization will increase organizational effectiveness by establishing managerial control at the plant site. This change is, therefore, an organizational enhancement and has no effect on plant equipment or the technical qualifications of plant personnel.

The change in reporting relationship for the Purchasing & Material Services division (formerly the Procurement and Materials Management division) increases organizational effectiveness by revising the previous reporting relationship. The title revision is only a change in nomenclature and has no effect on job responsibilities.

The removal of the wording "Chairman of the Board" and "Vice Chairman of the Board" removes unnecessary detail from Figure 6.2-1. This change has no effect to overall organizational commitments or to job responsibilities.

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 (51 FR 7751). 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 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 involve a significant reduction in a margin of safety. These changes do not involve any changes in overall organizational commitments. 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 do not involve a significant hazards consideration.