



Stephen L. Smith
Engineering Vice President

January 12, 2022
ET 22-0001

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

Subject: Docket No. 50-482: Removal of the Table of Contents from the
Technical Specifications

Commissioners and Staff:

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Wolf Creek Nuclear Operating Corporation (WCNOC) requests an amendment to Renewed Facility Operating License No. NPF-42 to revise the Technical Specifications (TS) for the Wolf Creek Generating Station (WCGS), Unit 1. The proposed amendment would remove the Table of Contents (TOC) from the TSs and place it under licensee control.

Attachment I provides the evaluation of the proposed change. Attachment II provides the existing TS pages marked up to show the proposed change.

It has been determined that this amendment application does not involve a significant hazard consideration as determine per 10 CFR 50.92, "Issue of amendment." Pursuant to 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise nor requiring environmental review," Section (b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment.

The amendment application was reviewed by the Plant Safety Review Committee. In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," Section (b)(1), a copy of this amendment application, with Attachments, is being provided to the designated Kansas State official.

WCNOC requests approval of this proposed amendment by November 1, 2022. The license amendment, as approved, will be effective upon issuance and will be implemented within 90 days of the date of issuance.

P.O. Box 411 | Burlington, KS 66839 | 620-364-8831

There are no regulatory commitments contained in this submittal. If you have any questions concerning this matter, please contact me at (620) 364-4093, or Ron Benham at (620) 364-4204.

Sincerely,

A handwritten signature in black ink, appearing to read "S. L. Smith", written in a cursive style.

Stephen L. Smith


SLS/rit

Attachments: I Evaluation of the Proposed Change
 II Proposed Technical Specification Changes (Mark-up)

cc: S. S. Lee (NRC), w/a
 S. A. Morris, (NRC), w/a
 G. E. Werner (NRC), w/a
 K. S. Steves (KDHE), w/a
 Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Stephen L. Smith, 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 contents thereof; that he has executed the 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 
Stephen L. Smith
Vice President Engineering

SUBSCRIBED and sworn to before me this 12th day of January, 2022.




Notary Public

Expiration Date January 11, 2026

EVALUATION OF THE PROPOSE CHANGE

Subject: Removal of the Table of Contents from the Technical Specifications

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1.0 SUMMARY DESCRIPTION

This evaluation supports the Wolf Creek Nuclear Operating Corporation (WCNOC) request to amend Renewed Facility Operating License NFP-42 for Wolf Creek Generating Station, Unit 1. The proposed changes would revise the Technical Specifications (TS) to remove the table of contents (TOC) from the TS and place it under licensee control.

2.0 DETAILED DESCRIPTION

The proposed change would remove the TOC from the TS and place it under WCNOC (licensee) control. Note that no TS pages will be issued as a result of this proposed change. The TOC for the TS is not being eliminated. Following approval of this license amendment request (LAR), the responsibility for maintenance and issuance of updates to the TS TOC will transfer from the Nuclear Regulatory Commission (NRC) to WCNOC. The TOC will no longer be included in the TS and as such will no longer be part of the TS (Appendix A to the Renewed Facility Operating License).

3.0 TECHNICAL EVALUATION

The TOC does not meet the criteria specified in 10 CFR 50.36 requiring its inclusion within a plant's TS. 10 CFR 50.36(b) states:

Each license authorizing operation of a production or utilization facility of a type described in § 50.21 or § 50.22 will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to § 50.34.

The result of the WCNOC review indicates that the TS TOC was not listed in the regulation as one of the categories listed in 10 CFR 50.36(c).

10 CFR 50.36(a) indicates that a license application may provide other information associated with the TS, and gives an example of this information, i.e., the TS Bases, but also clearly indicates that the Bases are not a part of the TS. 10 CFR 50.36(a)(l) states:

Each applicant for a license ... shall include in his application proposed technical specifications in accordance with the requirements of this section. A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications.

Additionally, the "Writer's Guide for Plant-Specific Improved Technical Specifications" (Reference 1) was reviewed for guidance. The writer's guide refers to the TOC as "Technical Specification Front Matter," which also includes the Title Page and List of Effective Pages. The writer's guide describes the TS content as starting with Chapter 1, "Use and Application," and does not include the TOC as part of the content of the TS.

A TOC for the TS will be maintained under WCNOC control. The TOC will be issued by WCNOC in conjunction with the implementation of NRC-approved TS amendments.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.36(a)(1) states:

Each applicant for a license authorizing operation of a production or utilization facility shall include in his application proposed technical specification in accordance with the requirements of this section. A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specification.

Like the TS Bases, the TOC does not meet the criteria specified in 10 CFR 50.36 for inclusion within a plant's TS.

WCNOC has evaluated this change against the applicable regulatory requirements as described above. Based on this, there is reasonable assurance that the health and safety of the public, following approval of this change will remain unaffected .

4.2 Precedent

- Exelon Generation Company, LLC License Amendments for Braidwood Station Units 1 and 2; Byron Station Units 1 and 2; Dresden Nuclear Power Station, Units 2 and 3; James A. Fitzpatrick Nuclear Power Plant; R. E. Ginna Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; and Quad Cities Nuclear Power Station, Units 1 and 2 (Reference 2).
- Point Beach Nuclear Plant License Amendment Nos. 245 and 249 were issued on October 11, 2011 (Reference 3).
- Calvert Cliffs Nuclear Power Plant License Amendment Nos. 293 and 269 were issued on September 21, 2009 (Reference 4).

4.3 No Significant Hazards Consideration

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Wolf Creek Nuclear Operating Corporation (WCNOC) requests an amendment to Renewed Facility Operating License No. NPF-42 to revise the Technical Specifications (TS) for the Wolf Creek Generating Station (WCGS), Unit 1. The proposed amendment would remove the Table of Contents (TOC) from the TSs and place it under licensee control.

WCNOC has evaluated the proposed amendment in accordance with 10 CFR 50.91 against the standards in 10 CFR 50.92 and has determined that the operation of the facility in accordance with the proposed amendment presents no significant hazards consideration. WCNOC's evaluation against each of the criteria in 10 CFR 50.92 is discussed below.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed amendment is administrative and affects control of a document, the TOC, listing the specifications in the plant TS. Transferring control from the Nuclear Regulatory Commission (NRC) to WCNOG does not affect the operation, physical configuration, or function of plant equipment or systems. The proposed amendment does not impact the initiators or assumptions of analyzed events; nor does it impact the mitigation of accidents or transient events.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any previously evaluated?

Response: No

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The proposed change does not alter any assumptions made in the safety analysis.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change is administrative. The TOC is not required by regulation to be in the TS. Removal does not impact any safety assumptions or have the potential to reduce a margin of safety. The proposed change involves a transfer of control of the TOC from the NRC to WCNOG. No change in the technical content of the TS is involved .

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, WCNOG concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations,

and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL EVALUATION

The proposed amendment is confined to changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. Technical Specifications Task Force, TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications," dated June 2005.
2. Letter from Blake Purnell (U. S. NRC) to Mr. Bryan C. Hanson (Exelon Generation Company, LLC), "Braidwood Station, Units 1 and 2; Byron Station Units 1 and 2; Dresden Nuclear Power Station, Units 2 and 3; James A. Fitzpatrick Nuclear Power Plant; R. E. Ginna Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; and Quad Cities Nuclear Power Station, Units 1 and 2 – Issuance of Amendments to Remove Table of Contents from Technical Specifications (EPID L-2019-LLA-0125)," dated December 18, 2019. (ADAMS Accession No. ML19302E700)
3. Letter from Terry A. Beltz (U.S. NRC) to Mr. Larry Meyer (NextEra), "Point Beach Nuclear Plant, Units 1 and 2 - Issuance of Amendment RE: Request to Remove the Table of Contents from the Technical Specifications," dated October 11, 2011. (ADAMS Accession No. ML112640016)
4. Letter from Douglas V. Pickett (U .S. NRC) to Mr. James A. Spina (CCNPP), "Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 - Amendment RE: Request to Remove the Table of Contents from the Technical Specifications," dated September 21, 2009. (ADAMS Accession No. ML092120042)

ATTACHMENT II
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