

# WOLF CREEK NUCLEAR OPERATING CORPORATION

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Vice President Engineering

**NOV 8 1999**

ET 99-0047

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

Reference: (1) Letter WO 99-0029, dated March 26, 1999, from  
C. C. Warren, WCNO, to USNRC  
(2) Letter dated March 31, 1999 from J. N. Donohew, USNRC,  
to O. L. Maynard, WCNO  
Subject: Docket No. 50-482: Proposed Revision to Technical  
Specifications to Correct Editorial Errors

Gentlemen:

This letter transmits an application for amendment to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station (WCGS). This request proposes to revise various improved Technical Specifications to correct editorial errors made in the conversion application or in the certified copy (Reference 1). Reference 2 provided Amendment No. 123 and the associated Safety Evaluation for the conversion of the WCGS current Technical Specifications to the improved Technical Specifications. This letter is also requesting two corrections to Table LG of the NRC Safety Evaluation associated with Reference 2. The proposed changes only affected the improved Technical Specifications.

A safety evaluation is provided in Attachment I. A No Significant Hazards Consideration Determination is provided in Attachment II. Attachment III is the related Environmental Impact Determination. Marked up improved Technical Specifications pages are provided in Attachment IV. Attachment V are the recommended changes to Table LG of the NRC Safety Evaluation. Attachment VI provides a listing of commitments made in this submittal.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Kansas State Official. Wolf Creek Nuclear Operating Corporation requests approval of the proposed Technical Specifications by December 15, 1999 to support implementation of the improved Technical Specification on December 18, 1999. The proposed changes to the WCGS Technical Specifications will be implemented with the implementation of License Amendment No. 123.

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

Very truly yours,



Richard A. Muench

RAM/rlr

Attachments: I - Safety Evaluation  
II - No Significant Hazards Consideration Determination  
III - Environmental Impact Determination  
IV - Proposed Improved Technical Specification Change  
V - Recommended changes to Table LG of NRC Safety Evaluation  
VI - List of Commitments

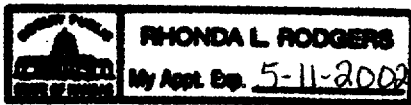
cc: V. L. Cooper (KDHE), w/a  
J. N. Donohew (NRC), w/a  
W. D. Johnson (NRC), w/a  
E. W. Merschoff (NRC), w/a  
Senior Resident Inspector (NRC), w/a

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 8<sup>th</sup> day of November, 1999.



*Rhonda L. Rodgers*  
Notary Public

Expiration Date May 11, 2002

**ATTACHMENT I**  
**SAFETY EVALUATION**

## **Safety Evaluation**

### **Proposed Changes**

This license amendment request proposes to revise various improved Technical Specifications to correct editorial errors made in the conversion application or in the certified copy of improved Technical Specifications transmitted by letter WO 99-0029, dated March 26, 1999. A specific list of the proposed changes is provided in the Background Section of this Attachment. License Amendment No. 123 and the associated Safety Evaluation was issued on March 31, 1999 for the conversion of the WCGS current Technical Specifications to the improved Technical Specifications. This letter is also requesting two corrections to Table LG of the NRC Safety Evaluation associated with License Amendment No. 123. The proposed changes only affect the improved Technical Specifications.

### **Background/Evaluation**

License Amendment No. 123 and the associated Safety Evaluation was issued on March 31, 1999 for the conversion of the WCGS current Technical Specifications (CTS) to the improved Technical Specifications (ITS). During activities associated with the implementation of License Amendment No. 123, a number of editorial corrections were identified. The below list are changes from what was provided in the conversion application and associated supplements:

1. Table of Contents, page ii. Section 3.3.7 - The abbreviation "(CREFS)" should be "(CREVS)". In the conversion application submittal, Attachment No. 19 (which provided the ITS with proposed changes incorporate at the time of initial submittal - May 15, 1997), the abbreviation was provided as "(CREFS)" when the correct abbreviation should be "(CREVS)".
2. Page 3.6-12. SR 3.6.3.1 states: "Verify each containment shutdown purge valve is sealed closed or closed and blind flange installed except for one purge valve in a penetration flow path while in Condition C of this LCO." In the SR, the reference to Condition C should state Condition D. In response to NRC Request for Additional Information (RAI) Q 3.6.3-26 (Letter ET 99-0015 dated March 25, 1999), Condition C of the Improved Standard Technical Specifications (ISTS) was incorporated into the ITS. Reinserting ISTS Condition C resulted in re-lettering the subsequent Conditions. Changing Condition C to Condition D in SR 3.6.3.1 was inadvertently overlooked when providing the ITS markups in response to NRC RAI Q 3.6.3-26. As currently issued by License Amendment No. 123, SR 3.6.3.1 is incorrect when it states "...while in Condition C of this LCO."
3. Page 3.7-22. The logical connector (AND) between Required Action E.1 and E.2 in ITS 3.7.10 is incorrectly located. The "AND" should be to the left margin in the Table per Section 1.3, "Logical Connectors," Example 1.2-1. Required Action E.1 and the logical connector were added as described in the Justification for Difference (JFD) 3.7-57 and the logical connector was incorrectly located in the conversion application submittal.

4. Page 3.9-6 - SR 3.9.4.1, "P-68" should be "P-98". In the response to NRC RAI Q 3.9-7 (letter ET 98-0107 dated December 21, 1998), the CTS and ITS were modified to remove TSTF-312. For Wolf Creek, a Note to LCO 3.9.4 was maintained to adopt the CTS wording approved by Amendment No. 107, dated July 11, 1997, that allowed penetrations P-63 and P-98 to be opened under administrative controls. Additionally, SR 3.9.4.1 was revised to except containment penetrations P-63 and P-98 if they are open under administrative controls to comply with the ITS format and rules of usage. In the markups provided in the RAI, the Note to the LCO specified P-63 and P-98. In the markups to SR 3.9.4.1, Penetrations P-63 and P-68 were identified. This markup incorrectly specified P-68 instead of P-98 in the SR.
5. Page 5.0-20. ITS 5.5.11e. states: "Demonstrate at least once per 18 months that the heaters for each of the ESF systems dissipate the value specified below when tested in accordance with ASME N510-1975." The word "ASME" is changed to "ANSI". CTS 4.7.6.e.3) and 4.9.13.d.2) specifically refer to ANSI N510-1975. Additionally, Regulatory Guide 1.52 refers to ANSI N510-1975. Leaving as the wording as ASME presents an inconsistency with 5.5.11f. and inconsistent with other regulatory documents.

During activities associated with the implementation of License Amendment No. 123, additional editorial corrections were identified that were attributed to errors associated with the submittal of the certified copy of the ITS. The below list is corrections based on errors in the certified copy of the ITS that was submitted by letter WO 99-0029 dated March 26, 1999.

1. Page 1.1-3. Add the word "least" into the definition of E-AVERAGE DISINTEGRATION ENERGY. This word was in the conversion submittal but was inadvertently left out in the March 26, 1999 submittal.
2. Page 3.2-6, 3.2-7 and 3.2-8 - the Section header for ITS 3.2.2 is in Letter Gothic font instead of Arial 11 font.
3. Page 3.3-15. In Table 3.3.1-1 (page 1 of 6) the allowable value associated with Functional Unit 2.b is not correctly aligned with the other columns for Functional Unit 2.b.
4. Page 3.3-29. The SURVEILLANCE REQUIREMENTS table is continued from page 3.3-28. The continued table does not have a header in the table for page 3.3-29.
5. Pages 3.4-17 and 3.4-18. ITS Section 3.4.8 header states: "RCS Loops - MODE 5, Loops Filled." This header is missing the word "Not." The header should read "RCS Loops - MODE 5, Loops Not Filled". The word "Not" was in the conversion submittal but was inadvertently left out in the March 26, 1999 submittal.
6. Page 3.6-7. The ACTIONS table does not start with a double line. The ACTIONS table should start with a double line as specified in Section 2.1.6 of NUMARC 93-03, "Writer's Guide for the Restructured Technical Specifications."
7. Page 4.0-1. ITS Section 4.3.1.1a., in the second sentence, the word enrichment is misspelled. This word was correctly spelled in the conversion submittal (RAI WC 3.7-009 in letter ET 99-0010 dated March 5, 1999) but was inadvertently misspelled in the March 26, 1999 submittal.

8. Page 5.0-3. ITS Section 5.2.2d., second paragraph, the word "granted" should be "granting". This word was correctly submitted in the conversion submittal (NRC RAI Q 5.2-1 in letter ET 99-0004 dated February 4, 1999) but was inadvertently changed in the March 26, 1999 submittal.
9. Page 5.0-19. ITS Section 5.5.11b., "Control Room emergency Ventilation System - Filtration" should be "Control Room Emergency Ventilation System - Filtration". Capitalize the "e" in emergency. This word was correctly submitted in the conversion submittal (RAI WC 5.0-006 in letter ET 98-0078 dated September 24, 1998) but was inadvertently not capitalized in the March 26, 1999 submittal.
10. Page 5.0-25. ITS Section 5.6.2, place a space between "Manual" and "(ODCM)." A space was inadvertently omitted.

### Conclusion

The proposed changes involve corrections to the ITS that are associated with the original conversion application and supplements or the certified copy of ITS. As such, the changes are considered as administrative changes and do not modify, add, delete, or relocate any technical requirements of the Technical Specifications.

### Corrections to Table LG in NRC Safety Evaluation

A verification was performed of the relocated requirements for compliance with the license condition authorizing the relocation to licensee-controlled documents. During this verification, four discrepancies were identified that require correction. Attachment V provides recommended changes to the table. Provided below is a discussion to the four discrepancies:

1. Change Number 8-08-LG in Section 3/4.6 (page 14). In the response to NRC RAI Q 3.6.6-5 (letter ET 98-0049 dated June 30, 1999), DOC 8-08-LG was revised to indicate that the relocated information was being placed into the ITS SR 3.6.6.4 Bases instead of the IST Program.
2. Change Number 9-09-LG in Section 3/4.7 (page 18). In response to NRC RAI Q 3.7.8-11 (letter ET 98-0085 dated October 16, 1998), DOC 9-09-LG was added to relocate the requirements (CTS SR 4.7.4.a and 4.7.4.c) to perform an Analog Channel Operational Test to a licensee controlled document (USAR). The SER table had the incorrect New Location, Control Process and Characterization.
3. Change Number 10-26-LG in Section 3/4.7 (page 18). In response to NRC RAI Q 3.7.10-18 (letter ET 98-0085 dated October 16, 1998), DOC 10-26-LG was added to relocate the details associated with performing CTS surveillance 4.7.6.e.2) to the ITS SR 3.7.10.3 Bases. The SER table had the incorrect Location and Control Process.
4. Change Number 1-20-LG in Section 3/4.8 (page 19). In RAI WC 3.8-ED (letter ET 98-0102 dated December 17, 1998), Wolf Creek indicated that this information would be relocated to the ITS Bases instead of the USAR.

ATTACHMENT II

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION



## **No Significant Hazards Consideration Determination**

### **Proposed Changes**

This license amendment request proposes to revise various improved Technical Specifications to correct editorial errors made in the conversion application or in the certified copy of improved Technical Specifications (ITS) transmitted by letter WO 99-0029, dated March 26, 1999. License Amendment No. 123 and the associated Safety Evaluation was issued on March 31, 1999 for the conversion of the WCGS current Technical Specifications to the improved Technical Specifications. This letter is also requesting two corrections to Table LG of the NRC Safety Evaluation associated with License Amendment No. 123. The proposed changes only affect the improved Technical Specifications.

### **Application of Standards**

The following Standards identified in 10 CFR 50.92 have been used to determine whether the proposed changes involve a Significant Hazards Consideration. Each of the identified proposed changes is evaluated against the three Standards.

#### **Standard I - Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated**

The proposed changes involve corrections to the ITS that are associated with the original conversion application and supplements or the certified copy of ITS. The changes are considered as administrative changes and do not modify, add, delete, or relocate any technical requirements of the Technical Specifications. As such, the administrative changes do not effect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

#### **Standard II - Create the Possibility of a New or Different Kind of Accident from any Previously Evaluated**

The proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The proposed changes will not impose any new or eliminate any old requirements. Thus, the changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

#### **Standard III - Involve a Significant Reduction in the Margin of Safety**

The proposed changes will not reduce a margin of safety because they have no effect on any safety analyses assumptions. The changes are administrative in nature. Therefore, the changes do not involve a significant reduction in the margin of safety.

**Conclusions**

Based on the above discussions, it has been determined that the requested technical specification revisions do not involve a significant increase in the probability of consequences of an accident or other adverse conditions over previous evaluations; or create the possibility of a new or different kind of accident or condition over previous evaluations; or involve a significant reduction in a margin of safety. Therefore, the requested license amendment does not involve a significant hazards consideration.

ATTACHMENT III  
ENVIRONMENTAL IMPACT DETERMINATION

### **Environmental Impact Determination**

This license amendment request proposes to revise various improved Technical Specifications to correct editorial errors made in the conversion application or in the certified copy of improved Technical Specifications (ITS) transmitted by letter WO 99-0029, dated March 26, 1999. License Amendment No. 123 and the associated Safety Evaluation was issued on March 31, 1999 for the conversion of the WCGS current Technical Specifications to the improved Technical Specifications. This letter is also requesting two corrections to Table LG of the NRC Safety Evaluation associated with License Amendment No. 123. The proposed changes only affect the improved Technical Specifications.

10 CFR 51.22(b) specifies the criteria for categorical exclusions from the requirement for a specific environmental assessment per 10 CFR 51.21. This amendment request meets the criteria specified in 10 CFR 51.22(c)(9) as specified below:

**(i) the amendment involves no significant hazards consideration**

As demonstrated in Attachment II, the proposed changes do not involve any significant hazards consideration.

**(ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite**

None of the proposed changes involves a change to the facility or operating procedures that would cause an increase in the amounts of effluents or create new types of effluents.

**(iii) there is no significant increase in individual or cumulative occupational radiation exposure**

The proposed changes are administrative in nature and do not require any changes to Trip Setpoints. These changes have no relation to occupational radiation exposure, either individual or cumulative.

Based on the above, it is concluded that there will be no impact on the environment resulting from this change and the change meets the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.21 relative to requiring a specific environmental assessment by the Commission.