



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 131 TO FACILITY OPERATING LICENSE NO. NPF-42  
WOLF CREEK NUCLEAR OPERATING CORPORATION  
WOLF CREEK GENERATING STATION  
DOCKET NO. 50-482

1.0 INTRODUCTION

By application dated November 8, 1999, Wolf Creek Nuclear Operating Corporation (the licensee) requested changes to the Improved Technical Specifications (ITSs, Appendix A to Facility Operating License No. NPF-42) for the Wolf Creek Generating Station (WCGS). The proposed changes correct errors in the ITSs that were issued in Amendment No. 123 dated March 31, 1999. The ITSs are to be implemented by December 31, 1999, when they replace the current Technical Specifications.

In its application, the licensee identified 15 errors in the ITSs of Amendment No. 123, and 4 errors in Table LG, "Details Relocated from Current Technical Specifications," that was attached to the safety evaluation dated March 31, 1999, issued with Amendment No. 123. The proposed changes to Table LG will affect the implementation of the ITSs that were issued on March 31, 1999, because a license condition issued with the ITSs required the relocation of information and requirements from the previous technical specifications in accordance with certain tables attached to the safety evaluation, including Table LG.

2.0 EVALUATION

The attached table identifies the 15 errors in the ITSs and the 4 errors in Table LG of the safety evaluation issued with the ITSs that were submitted by the licensee. The staff has reviewed the licensee's proposed corrections to the WCGS ITSs and to Table LG of the safety evaluation and has considered the following information:

- The licensee's application and supplemental letters identified in Amendment No. 123.
- The Improved Standard Technical Specifications (ISTS), NUREG-1431, "Standard Technical Specifications Westinghouse Plants," dated April 1995. The WCGS ISTs is based upon this NUREG.
- The safety evaluation approving the ITSs in Amendment No. 123 and issued with the amendment in the staff's letter dated March 31, 1999.
- The licensee's justification in its application for the correction.

The licensee's proposed 15 corrections to the ITSs are addressed in the attached table. Based on the justifications given in the attached table, the staff concludes that the 15 corrections need to be made to the ITSs for the ITSs to be correct, and are acceptable.

For the four corrections to Table LG of the safety evaluation issued with Amendment No. 123, the staff addressed relocations in Section 4.D, pages 28 to 32, of the safety evaluation. Section 4.D addressed the relocation of the current Technical Specifications (CTSs) to licensee-controlled documents outside the CTSs and the ITSs. When the ITSs are implemented by December 31, 1999, the ITSs will replace the CTSs.

In all 4 cases of correcting the relocated document, the relocations are made to licensee-controlled documents (i.e., the ITS Bases or the Updated Safety Analysis Report, USAR) which are acceptable to the staff for relocations because further changes to requirements in these documents are controlled by the ITSs or by acceptable regulations. As discussed in Section 4.D of the safety evaluation for Amendment No. 123, changes to the ITS Bases are controlled by ITS Section 5.5.14 which requires the change criteria in 10 CFR 50.59 be applied to the changes. Changes to the USAR are controlled by the regulation in that 10 CFR 50.59 requires the change criteria in 10 CFR 50.59 be applied to the changes.

The staff concluded in the safety evaluation for Amendment No. 123 that the ITS Bases and USAR are acceptable licensee-controlled documents to incorporate relocated CTS requirements and information, and the change control criteria in 10 CFR 50.59 were adequate for further changes to the relocated requirements. Therefore, the staff concludes that changing the documents where the CTS requirements and information will be relocated, as described in the 4 corrections submitted by the licensee, is acceptable because the corrected document is also an acceptable licensee-controlled document. The change control process is changed to the correct process, as discussed above, and in one case the description of the relocated information is revised. The revision to the description of the relocated information does not change the type of relocation that is discussed in Section 4.D of the safety evaluation for Amendment No. 123.

The corrected pages 14 and 18 through 23 of Table LG are attached to this safety evaluation. Pages 20 through 23 are included because the corrections to previous page 18 move table rows to the next page and the correction to previous page 19 now appears on the new page 20 and the last page in Table LG (after page 18) that does not have table rows move to the next page which is page 23.

Based on the above, the staff concludes that the 15 proposed corrections to the ITS and the 4 proposed corrections to Table LG of the safety evaluation included in Amendment No. 123 are acceptable.

The implementation of the license condition concerning the relocation of CTS requirements listed in Table LG of the safety evaluation by December 31, 1999, as part of the implementation of Amendment No. 123, will follow the corrected pages 14, and 18 through 23 of Table LG, that are attached to this safety evaluation.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Kansas State Official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (64 FR 62231). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (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.

Attachments: 1. Description of Changes  
2. Pages 14, 18 through 23 of Table LG

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Date: December 16, 1999

**Table of Licensee Identified Errors in the ITSs or the Safety Evaluation Issued With the ITSs**

Error Location	Description of and Justification for the Correction
ITS Table of Contents, Page ii	The correct acronym for "Control Room Emergency Ventilation System" for ITS Section 3.3.7 is "CREVS" instead of "CREFS."
ITS Section 1.1, Page 1.1-3	The missing word "least" is added to the definition of E-AVERAGE DISINTEGRATION ENERGY to form a correct sentence in the definition. The corrected sentence is "..., making up at 'least' 95% of the total noniodine activity in the coolant." The word "least" is given in the definition of the ISTS.
ITS Section 3.2.2, Pages 3.2-6, 3.2-7, and 3.2-8	The font in the section header for ITS Section 3.2.2 is corrected from letter gothic to arial. The arial font is used for the rest of the ITSs.
ITS Section 3.3, Page 3.3-15, Table 3.3.1-1	The allowable value in the table for functional unit 2.b is correctly aligned with the functional unit as are the other data in the other columns of the table.
ITS Section 3.3.2, Page 3.3-29	The headings of "SURVEILLANCE" and "FREQUENCY" for the surveillance requirements are added to the top of the page as exists for pages 3.3-30 and 3.3-31. This is the format for ITS surveillance requirements in the ISTS.
ITS Section 3.4.8, Pages 3.4-17 and 3.4-18	The missing word "Not" is added to the title of the section on the top of the pages to have the correct title for the ITS limiting condition for operation (LCO) 3.4.8: RCS Loops - MODE 5, Loops "Not" Filled.
ITS Section 3.6.3, Page 3.6-7	A missing double line was added to the actions table ITS LCO 3.6.3 to be consistent with the format of the ITS.
ITS Section 3.6.3, Page 3.6-12	The correct reference to an action condition of LCO 3.6.3 in SR 3.6.3.1 is "Condition D" instead of "Condition C." First, Condition C, applying to only penetration flowpaths with one containment isolation valve and a closed system, is inconsistent with SR 3.6.3.1 which applies to purge valves sealed closed, or closed and blind flange installed, and, second, the condition in the ITSs that is the same as the condition referenced by SR 3.6.3.1 in the ISTS is Condition D of the ITSs (i.e., the Condition E of the ISTS is the Condition D of the ITSs).
ITS Section 3.7.10, Page 3.7-22	The logical connector "and" between the E.1 and E.2 required actions for LCO 3.7.10 is moved to be correctly located consistent with the format of the ITS.
ITS Section 3.9.4, Page 3.9-6	The incorrect penetration number for Surveillance Requirement (SR) 3.9.4.1 was corrected from "P-68" to "P-98." The licensee stated that the correct penetration number for this SR is P-98.

ITS Section 4.3, Page 4.0-1	The spelling of the word "enrichment" is corrected in ITS Section 4.3.1.1.a on fuel storage.
ITS Section 5.2.2, Page 5.0-3	The form of the verb "grant" is corrected from "granted" to "granting" in the second paragraph of Section 5.2.2.d on unit staff requirements. The correct sentence is "..., and with documentation of the basis for 'granting' the deviation."
ITS Section 5.5.11, Page 5.0-19	The word "emergency" in the title "Control Room emergency Ventilation System - Filtration" is capitalized, in Subsection 5.5.11.b on the Ventilation Filter Testing Program, to be consistent with the format of the ITS.
ITS Section 5.5.11, Page 5.0-20	The correct reference to a standard in ITS 5.5.11.e is "ANSI N510-1975" instead of "ASME N510-1975." Wolf Creek committed to the 1975 version of the standard which is ANSI N510-1975. The 1989 version of the standard, which is given in the ISTS, is ASME N510-1989, and incorrectly "ASME" was used in the ITSs.
ITS Section 5.6.2, Page 5.0-25	A space is placed between "Manual" and "(ODCM)" to separate the word from the acronym to correctly have "Manual (ODCM)" instead of "Manual(ODCM)" in the sentence of the first paragraph of Section 5.6.2 on Annual Radiological Environmental Operating Report.
ITS SE Table LG, Page 14	The information to be relocated for change number 8-08-LG will be relocated to the ITS Bases for SR 3.6.6.4 instead of the inservice testing (IST) program, and the change control process identified in the table will be corrected to ITS 5.5.14.
ITS SE Table LG, Page 18	The information to be relocated for change number 9-09-LG (requirements to perform an analog channel operational test) will be relocated to the updated safety analysis report (USAR) instead of the ITS Bases, the change control process will be corrected to 10 CFR 50.59, and characterization of the information being relocated will be corrected to relocation of the requirement to perform analog channel operational tests and channel calibrations.
ITS SE Table LG, Page 18	The information to be relocated for change number 10-26-LG will be relocated to the ITS Bases for SR 3.7.10.3 instead of the USAR, and the change control process will be corrected to ITS 5.5.14.
ITS SE Table LG, Page 19	The information to be relocated for change number 1-20-LG will be relocated to the ITS Bases instead of the USAR, and the change control process will be corrected to ITS 5.5.14.

**Table LG - Details Relocated from Current Technical Specifications**

<b>Change Number (CN)</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Characterization</b>	<b>Type</b>
7-07 LG	SR 4.6.1.7.2 SR 4.6.1.7.4	Containment ventilation system surveillance.	ITS Bases	ITS 5.5.14	Relocation of the leakage rate test acceptance criterion for containment isolation valves with resilient seals. ITS SR 3.6.1.1 is for the leak rate.	3
7-09 LG	LCO 3.6.1.7 Action a SR 4.6.1.7.1/2	Containment ventilation system.	ITS Bases	ITS 5.5.14	Relocation of descriptive details regarding the valve size and isolation requirements.	1,2
8-01 LG	LCO 3.6.2.1	Containment spray system (CSS) operability	ITS Bases	ITS 5.5.14	Deleted the LCO references to suction flowpath and manual transfer of suction to containment sump. These details are in the CSS operability discussion in the Bases.	1,2
8-06 LG	SR 4.6.2.1.d	CSS surveillance.	ITS Bases	ITS 5.5.14	Relocation of the details on flow testing for nozzle obstructions and specific actuation signals that apply for automatic actuations.	3
8-08 LG	SR 4.6.2.1.b	CSS surveillance.	ITS Bases	ITS 5.5.14	Relocation of the specific pump discharge pressure.	2
8-09 LG	SR 4.6.2.1.c SR 4.6.2.2.c	CSS and spray additive system surveillance.	ITS Bases	ITS 5.5.14	Relocation of the requirement to perform the 18-month verification during shutdown.	3

**Types of Relocated Details:**

Type 1 Details of System Design.

Type 2 Descriptions of System Operation.

Type 3 Procedural Details for Meeting TS Requirements.

Type 4 Requirements Redundant to Regulations.

Type 5 Requirements Not Meeting the Safety Analyses

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8-09 LG	SR 4.7.3.b	CCW system surveillance.	ITS Bases	ITS 5.5.14	Relocation of details defining the specific valves that are the focus of the surveillance.	1
9-08 LG	SR 4.7.4.b	ESW system surveillance	ITS Bases	ITS 5.5.14	Relocation of details defining the specific valves that are the focus of the surveillance.	1
9-09 LG	SR 4.7.4.a SR 4.7.4.c	ESW system surveillance	USAR	50.59	Relocation of requirement to perform analog channel operational tests and channel calibrations.	5
10-01 LG	3/4.7	Not Applicable to WCGS.				
10-06 LG	SR 4.7.6.b	Control room emergency ventilation system (CREVS) surveillance.	ITS Bases	ITS 5.5.14	Relocation of the details and description of the monthly surveillance.	5
10-07 LG	SR 4.7.6.a	CREVS surveillance.	USAR	50.59	Relocation of the surveillance that verifies control room temperature once per 12 hours.	5
10-13 LG	3/4.7	Not Applicable to WCGS.				
10-15 LG	SR 4.7.6.c	CREVS surveillance.	USAR	50.59	Relocation of the ventilation flow rates.	5
10-16 LG	3/4.7	Not Applicable to WCGS.				

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10-26 LG	SR 4.7.4.e	CREVS surveillance.	ITS Bases	ITS 5.5.14	Relocation of the details on the method for performing the CREVS actuation surveillance.	3
10-32 LG	3/4.7	Not Applicable to WCGS				
12-06 LG	3/4.7	Not Applicable to WCGS.				
12-11 LG	3/4.7	Not Applicable to WCGS.				
13-01 LG	3/4.7	Not Applicable to WCGS.				
13-02 LG	3/4.7	Not Applicable to WCGS.				
13-04 LG	LCO 3.7.5 Action SR 4.7.5.b	Ultimate heat sink (UHS) operability and surveillance.	USAR	50.59	Relocation of the description of the required dam height and the requirement for the surveillance.	5
13-06 LG	3/4.7	Not Applicable to WCGS.				
13-07 LG	3/4.7	Not Applicable to WCGS.				
18-02 LG	3/4.7	Not Applicable to WCGS.				
18-04 LG	3/4.7	Not Applicable to WCGS.				
20-01 LG	3/4.7	Not Applicable to WCGS.				
1-16 LG	SR 4.8.1.1.2.f	AC sources, diesel generator (DG ) start surveillance.	ITS Bases	ITS 5.5.14	Relocation of the details on the method to start the DG.	3

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1-20 LG	SR 4.8.1.1.2.a.6	AC sources surveillances.	ITS Bases	ITS 5.5.14	Relocation of details that reflect normal design, maintenance or line-up activities/descriptions rather than features specifically needed to successfully mitigate a transient.	1,2
1-23 LG	3/4.8	Not Applicable to WCGS.				
1-28 LG	3/4.8	Not Applicable to WCGS.				
1-30 LG	SR 4.8.1.1.2.g.6	DG 24-hour full load surveillance.	ITS Bases	ITS 5.5.14	Relocation of details for the surveillance voltage and frequency start requirements.	3
1-37 LG	SR 4.8.1.1.2.d SR 4.8.1.1.2.e	Diesel fuel oil surveillance.	Diesel fuel oil testing program (DFOTP)	5.5.13	Relocation of the details on sampling diesel fuel oil (DFO) and verifying its properties.	3
1-38 LG	SR 4.8.1.1.2.i	Fuel oil storage tank cleaning surveillance.	USAR	50.59	Relocation of the details for the fuel oil storage tank cleaning surveillance.	3
1-39 LG	3/4.8	Not Applicable to WCGS.				
1-44 LG	LCO 3.8.1.2, Action	AC sources - shutdown action statement.	USAR	50.59	Relocation of the details in the action statement referring to crane operations with loads over the spent fuel pool.	3

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1-58 LG	SR 4.8.1.1.2.g.10	DG fuel transfer pump surveillance	USAR	50.59	Relocation of the requirement to verify that the DFO transfer pump transfers fuel from each storage tank to each DG day tank.	5
1-63 LG	3/4.8	Not Applicable to WCGS.				
1-72 LG	3/4.8	Not Applicable to WCGS.				
2-01 LG	LCO 3.8.2.1 (and Action) LCO 3.8.2.2.a/b (and Action)	DC sources operating and shutdown.	ITS Bases	ITS 5.5.14	Relocation of the list of batteries and chargers in the LCOs and actions.	3
2-12 LG	Table 4.8-2, Note 6	DC battery surveillance requirements table	ITS Bases	ITS 5.5.14	Relocation of the detail in the note regarding correction of float voltage for average electrolyte temperature.	3
2-18 LG	SR 4.8.2.1.b.3 SR 4.8.2.1.f	DC battery service test surveillance.	ITS Bases	ITS 5.5.14	Relocation of the detail of the number of connected cells that constitutes "representative cells" and the discussion of degradation as it relates to performance tests.	3
2-24 LG	3/4.8	Not Applicable to WCGS.				
3-01 LG	LCO 3.8.3.1 and Action a LCO 3.8.3.2 and Action a	Onsite power distribution - operating LCO.	ITS Bases	ITS 5.5.14	Relocation of the list of required electrical buses, batteries and chargers.	1

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1-02 LG	LCO 3.9.1	Boron concentration requirements.	ITS Bases COLR	ITS 5.5.14 5.6.5	Relocation of the details to maintain a uniform concentration to the Bases and the limits for the boron concentration to the COLR.	3
1-03 LG	3/4.9	Not Applicable to WCGS.				
1-04 LG	LCO 3.9.1	Boron concentration operability.	ITS Bases	ITS 5.5.14	Relocation of the detail that the specified limit on $k_{eff} \leq 0.95$ . The limit is maintained by the LCO to keep boron concentration within limits.	3
1-10 LG	SR 4.9.1.2	Boron concentration surveillance.	ITS Bases	ITS 5.5.14	Relocation of the detail in the SR to determine the boron concentration by chemical analysis.	3
1-12 LG	3/4.9	Not Applicable to WCGS.				
2-04 LG	3/4.9	Not Applicable to WCGS.				
4-01 LG	LCO 3.9.4.c.2	Containment building penetrations.	ITS Bases	ITS 5.5.14	Relocation of the detail for "automatic" containment ventilation isolation valves.	3
4-05 LG	3/4.9	Not Applicable to WCGS.				
4-07 LG	3/4.9	Not Applicable to WCGS.				
4-08 LG	3/4.9	Not Applicable to WCGS.				

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11-01 LG	LCO 3.9.11, Applicability and SR 4.9.11	Movement of irradiated fuel assemblies in the fuel storage areas.	USAR	50.59	Relocation of the details on when irradiated fuel is in the fuel storage areas.	3
11-04 LG	LCO 3.9.11, Action a	Water level in irradiated fuel storage pool.	USAR	50.59	Relocation of detail about restrictions on crane operation. Crane operations that could adversely affect fuel stored in the spent fuel pool are controlled as analyzed in the review of heavy load movements.	3
12-02 LG	LCO 3.9.13, Actions a and b	Emergency exhaust system, fuel building actions	USAR	50.59	Relocation of the restriction on crane operations over the spent fuel storage areas when the fuel building air cleanup system is inoperable.	5
12-09 LG	3/4.9	Not Applicable to WCGS.				
12-14 LG	SR 4.9.13.a	Emergency exhaust system - fuel building surveillance.	ITS Bases	ITS 5.5.14	Relocation of details and description of the monthly surveillances for train operability.	3

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