Description of amendment request: The proposed amendment would revise Kewaunee Nuclear Power Plant (KNPP) Technical Specification (TS) 3.4 by removing the Limiting Conditions for Operation (LCOs) for the Turbine Overspeed Protection System (TOPS). Tables TS 4.1–1 and TS 4.1–3 would also be revised to remove the surveillance requirements for the TOPS instrumentation and turbine valves. The TOPS and related requirements would be relocated to the Updated Safety Analysis Report (USAR).

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration which is presented below:

Significant Hazards Determination for Proposed Changes to TS 3.4.c and Table TS 4.1–1 and Associated Bases Changes

In accordance with 10 CFR Part 50, Section 50.91 and using the standards provided in Section 50.92, the proposed change has been reviewed to determine that no significant hazards exist as a result of this change. The analysis showed:

(1) The proposed amendment will not involve a significant increase in the probability or consequence of an accident previously evaluated.

The purpose of the Turbine Overspeed Protection System (TOPS) is to prevent an overspeed event, which is a precursor to a potential turbine-generated missile. Neither Transient Analyses nor Design Basis Accidents (DBAs) evaluated in the accident analyses contained in Chapter 14 of the Kewaunee Nuclear Power Plant (KNPP) Updated Safety Analysis Report (USAR) assume operation of the TOPS. The calculations and probabilities associated with USAR section 14.2.7, "Turbine Missile Damage to the Spent Fuel Pool," are not affected by this amendment. This amendment does not implement physical changes to the plant and does not change the KNPP's existing requirements. As a result, this change will not increase the probability of a previously evaluated accident.

The purpose of the TOPS is preventative and it serves no function to mitigate the consequences of any accident previously evaluated. Therefore, removing the requirements associated with the TOPS from the TSs will not affect the consequences of an accident previously evaluated.

(2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

This amendment does not involve any changes in the operational characteristics of the surveillance tests and will impose no new requirements. This change will simply relocate the same testing requirements from the KNPP Technical Specifications to the KNPP USAR. Since this change is administrative in nature, it will not create a new or different kind of accident from any accident previously evaluated.

(3) The proposed amendment will not involve a significant reduction in the margin of safety

KNPP's USAR section 14.2.7, "Turbine Missile Damage to the Spent Fuel Pool," will not be affected by this amendment. Relocating the TOPS and related requirements is a change that is administrative in nature and does not alter the intent of any requirements. Therefore it can be concluded that this change will not involve a significant reduction in the margin of safety.

Significant Hazards Determination for Proposed Change to Table TS 4.1–3 and associated Basis Change

In accordance with 10 CFR Part 50, Section 50.91 and using the standards provided in Section 50.92, the proposed change has been reviewed to determine that no significant hazards exist as a result of this change. The analysis showed:

(1) The proposed amendment will not involve a significant increase in the probability or consequence of an accident previously evaluated.

This amendment does not involve any changes in the operation or frequency of the turbine valve tests. This amendment will simply relocate the turbine valve testing requirements from the Kewaunee Nuclear Power Plant's (KNPP's) Technical Specifications (TSs) to the Updated Safety Analysis Report (USAR). This change is administrative in nature and therefore will not involve a significant increase in the probability or consequence of an accident previously evaluated.

(2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

This amendment is administrative in nature and will not change any requirements. This change will simply relocate the requirements from the KNPP TSs to the USAR. The purpose of the turbine stop and governor valves is to control steam flow to the turbine. This amendment will not adversely affect the steam flow control capability of the turbine valves. Therefore, this change will not create the possibility of a new or different type of accident from any accident previously evaluated.

(3) The proposed amendment will not involve a significant reduction in the margin of safety.

This amendment will simply relocate the existing turbine valve testing requirements and will not result in any changes to the requirements. The KNPP will continue to follow the recommendations of WCAP 11525, "Probabilistic Evaluation of Reduction in Turbine Valve Test Frequency." As a result, KNPP will continue to maintain acceptably low probabilities of turbine valve failure. Since the same requirements still exist and turbine valve testing will continue to be consistent with the recommendations of WCAP 11525, this amendment will not involve a significant decrease in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three

standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room location: University of Wisconsin Library Learning Center, 2420 Nicolet Drive, Green Bay, Wisconsin 54301.

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*NRC Project Director:* Leif J. Norrholm.

## Wolf Creek Nuclear Operating Corporation, Docket No. 50–482, Wolf Creek Generating Station, Coffey County, Kansas

Date of amendment request: December 12, 1994.

Description of amendment request: This amendment request proposes revising Technical Specifications 4.7.1.2.1.b.1 and 4.7.1.2.1.b.2 to clarify the surveillance requirements for verifying the correct required position for the valves in the auxiliary feedwater system.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes do not affect the ability of the auxiliary feedwater system to perform its intended safety function. The changes are administrative in nature since they merely clarify the demonstration of operability required in the surveillance requirements.

2. The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

There are no new failure modes or mechanisms associated with the proposed changes. The changes are administrative changes to remove confusion when performing surveillance requirements to demonstrate operability.

3. The proposed changes do not involve a significant reduction in the margin of safety.

These proposed changes do not effect [sic] any technical specification margin of safety. The changes only provide clarification for performance of surveillance requirements.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.