



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 EAST LAMAR BLVD  
ARLINGTON, TEXAS 76011-4511

July 9, 2012

Mr. Matthew W. Sunseri, President and  
Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
P.O. Box 411  
Burlington, KS 66839

SUBJECT: SUMMARY OF PUBLIC MEETING WITH WOLF CREEK NUCLEAR  
OPERATING CORPORATION

Dear Mr. Sunseri:

On June 25, 2012, representatives of Wolf Creek Nuclear Operating Corporation met with NRC personnel at the NRC Region IV office in Arlington, TX to present an update on the initiatives being implemented to improve station performance. The list of attendees and a copy of the licensee's presentation are included as Enclosures 1, 2 and 3.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html> (The Public Electronic Reading Room).

Sincerely,

**/RA/**

Neil O'Keefe  
Chief, Project Branch B  
Division of Reactor Projects

Docket: 50-482  
License: NPF-42

Enclosures:

1. NRC Presentation Slides
2. Presentation Slides

Electronic distribution by RIV:

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# **Wolf Creek Nuclear Operating Corporation**

**June 25, 2012**



## **Introductions**

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- Matt Sunseri, President and CEO
- John Broschak, Vice President Engineering
- Jennifer Yunk, Manager Performance Improvement/Organization Effectiveness
- Gautam Sen, Manager Regulatory Affairs



# Agenda

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- Elements of Substantive Crosscutting Issues Improvement:
  - Behaviors
  - People
  - Processes
  - Oversight
- Improved Performance
- Closing Comments



## Safety Culture Focus

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- Strengthening our safety culture by resolving our PI&R and Human Performance SCCIs:
  - Culture is driven by the behaviors that are reinforced in an organization
  - “Operators operate the plant safely, and the rest of us give them a safe plant to operate”
  - Setting and reinforcing clear expectations is key





# Behaviors

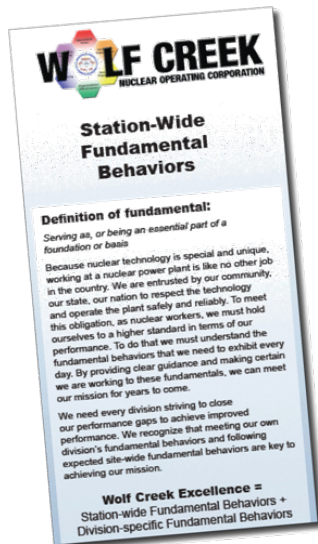
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- Strategy to drive change in behaviors:
  - Define station-wide fundamental behaviors
    - PI&R and Human Performance
      - Clearly establishing the standards
      - Visible reinforcement
  - Implementation of the Accountability Model
    - Accountability: the obligation of an individual or organization to account for its activities, accept responsibility for them and disclose results in a transparent manner.
  - Assessment and alignment of the leadership team



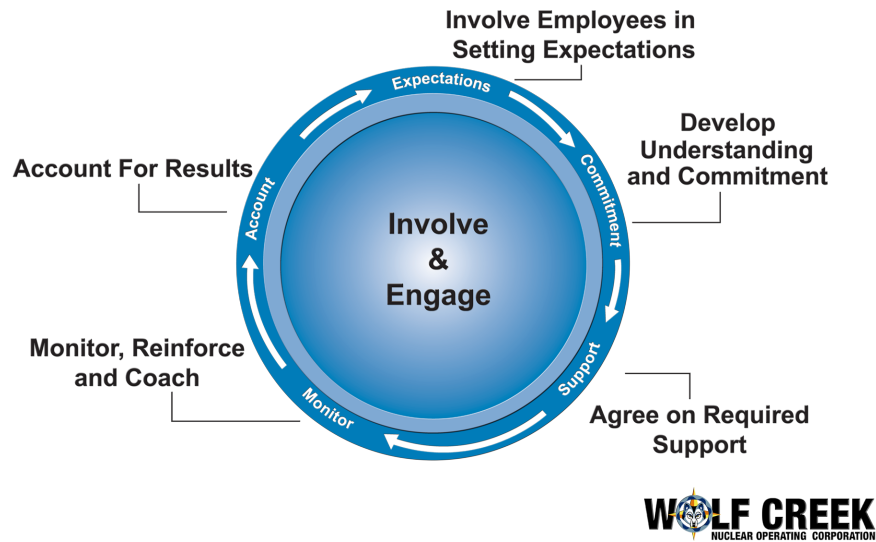
## Fundamental Behaviors

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# Accountability Model

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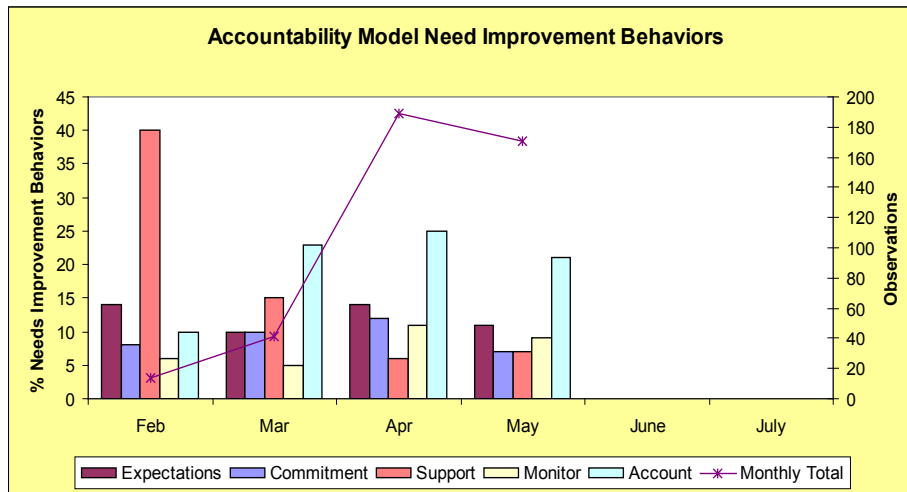


## Accountability Model In Action

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- Leaders visibly use the model in day-to-day interactions with staff:
  - When setting expectations
  - When assigning or delegating work
  - During pre-job briefs
  - During job performance discussions
  - During coaching conversations to close a performance gap
  - When providing daily feedback on work performance



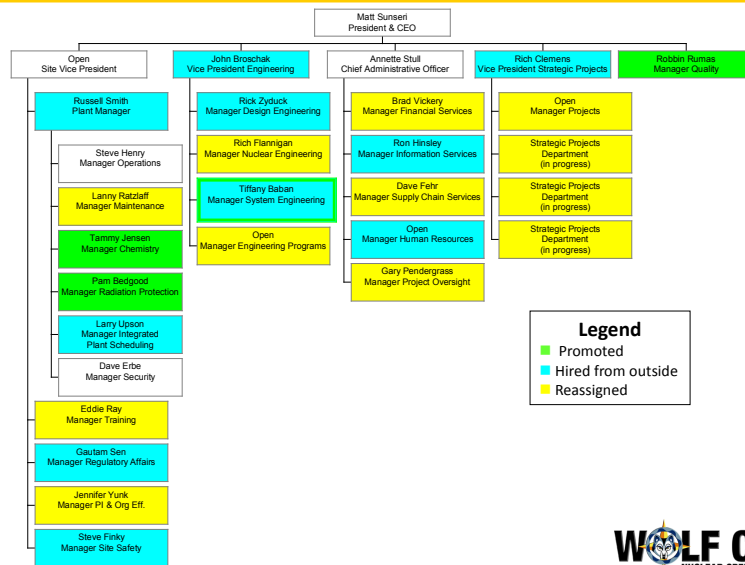


## Leadership Team Assessment

- Assessment and alignment of the leadership team
  - Strategic Talent Solutions process
    - Alignment interviews—three tiers
    - Feedback
    - Action plan to close gaps
  - Leadership changes
    - Engineering
    - Work Management
    - Training



# Building a Strong Team



## People

- Improving skills, knowledge and ability
  - Safety Culture
    - Understanding the elements and how we impact: PI&R, HU and SCWE
  - Operability evaluations
    - Evaluation quality, assumptions
  - Design and Licensing basis training
    - Engineering decision making and assumptions
    - Advanced systems training added to individual training plans
  - Corrective Action Program
    - Evaluation quality, extent of condition/cause, action development



# People

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- Improving skills, knowledge and ability (cont'd)
  - Human Performance Dynamic Learning
    - HU tool usage in a distractive environment
    - Procedure use and adherence
  - Operations Training
    - Operator fundamentals – “Back to Basics” (monitoring; control; conservatism; teamwork; knowledge)
    - Improved critique process for self-identification of issues
  - Supervisors reinforcement of behaviors
    - Fundamental behaviors – tri-fold
    - Accountability model
    - Culpability model



# Processes

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- Improved the corrective action program
  - Implemented single point of entry
  - Established Operations Work Group
    - SRO resources
    - Operability / functionality screening
    - Return to full qualification
  - Causal evaluation improvements
    - Conger and Elsea
    - Continuing training
    - CARB mentoring



## Oversight

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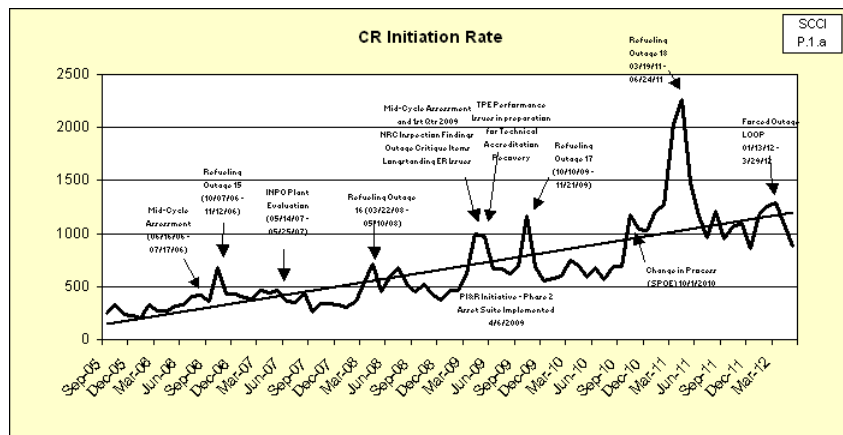
- Increased management engagement and involvement
  - Plant Safety Review Committee
  - Corrective Action Review Board
  - Quality Assurance Program
  - Challenge Boards
  - Senior Leadership Review Team
  - Management Review Meeting
  - Observation Program
  - Nuclear Safety Review Board
  - Board of Directors



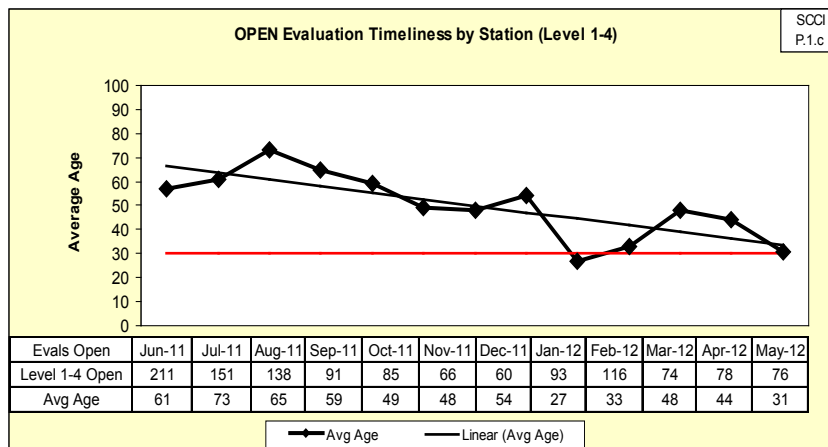
## Improved Performance



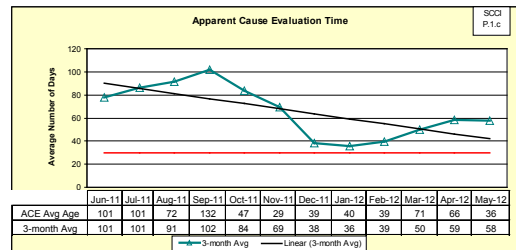
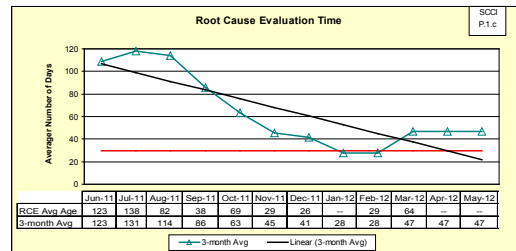
# Problem Identification & Resolution



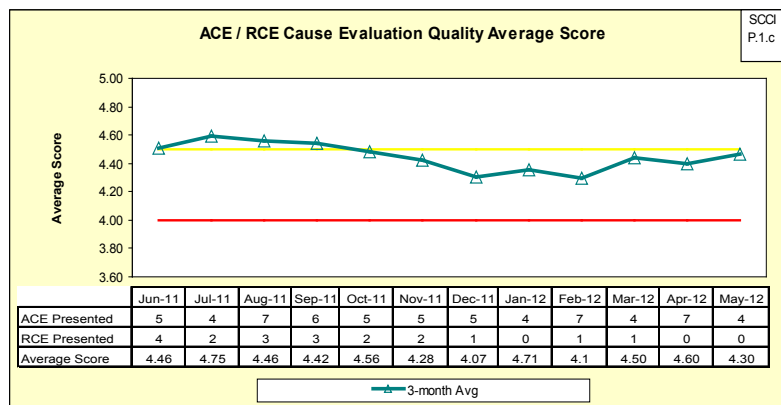
# Problem Identification & Resolution



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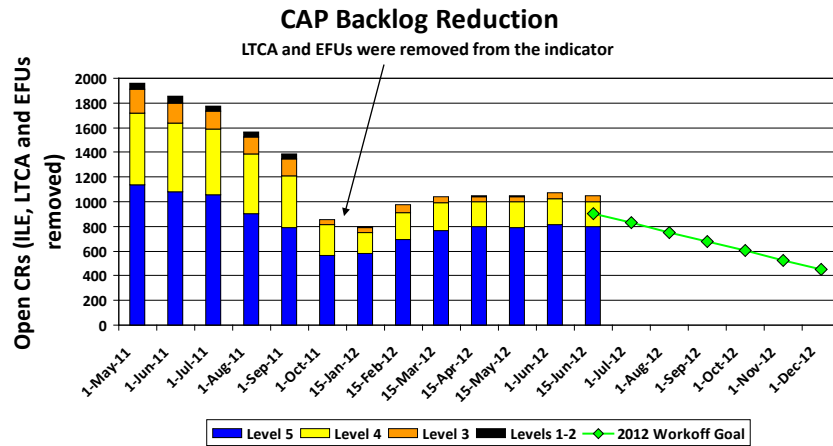


# Problem Identification & Resolution

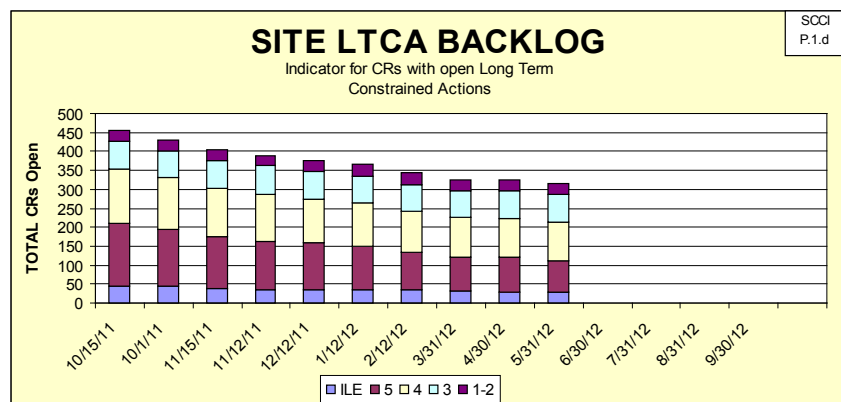




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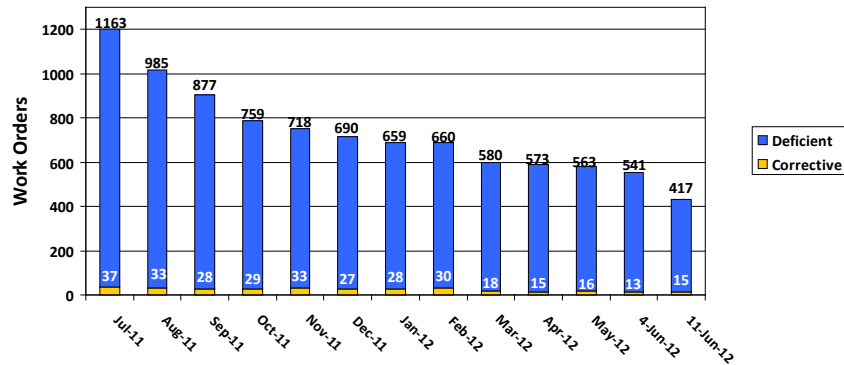


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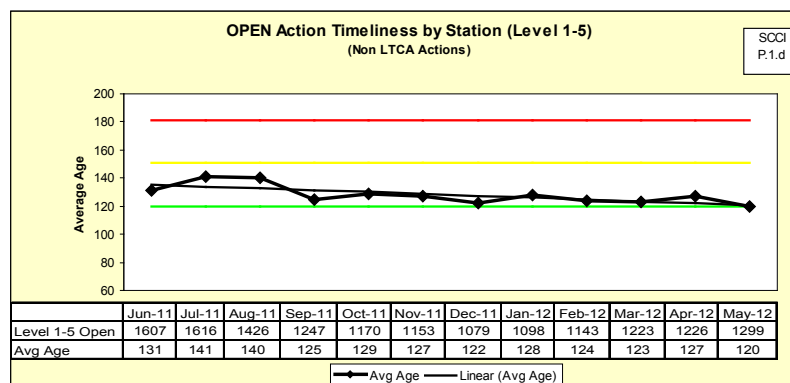


# Problem Identification & Resolution

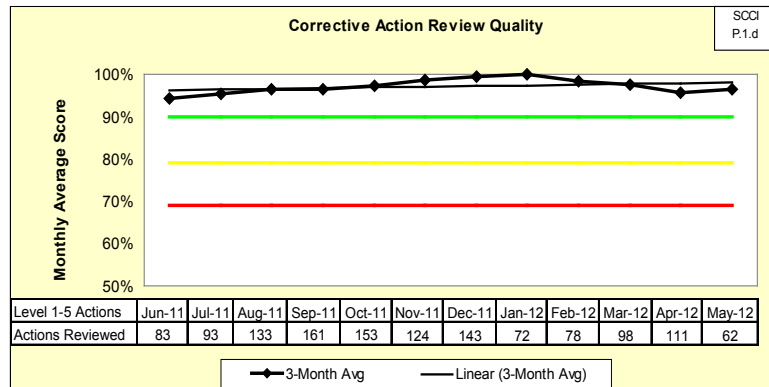
Total Maintenance Backlog Reduction



# Problem Identification & Resolution



# Problem Identification & Resolution

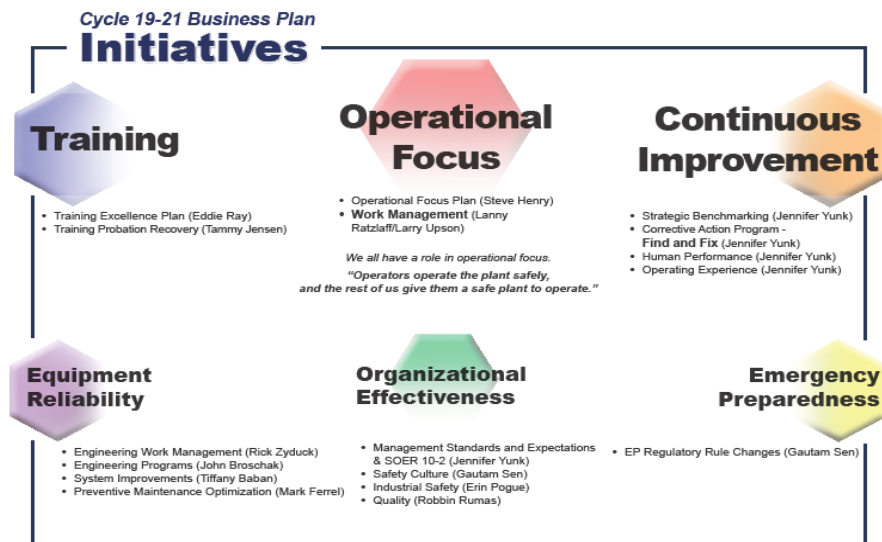


## Closing Comments



# Closing Comments

- Wolf Creek's Sustainability
  - Self critical of our performance
    - LOOP IIT
  - Comprehensive Business Plan
  - Three primary focus areas
    - Training
    - Work Management
    - Find and Fix
  - Drive implementation
    - Enforcing and doing



### Wolf Creek Vision

We as individuals and as a team will:

- Be recognized as the benchmark of excellence in everything we do
- Create a constructive nuclear safety culture and a thriving, enviable work environment by being true to our values.

### Wolf Creek Mission

Safe, reliable, cost-competitive production of electricity

### Wolf Creek Core Values

#### Safety

- We help people feel safe and appreciated when reporting safety issues.
- We achieve resolution to questions pertaining to safety with appropriate timeliness and rigor.

#### Teamwork

- We help each other be successful and address issues directly with our co-workers rather than behind their backs.
- We ensure alignment to common goals within and between work groups. We give up control over things that should be entrusted to others.

#### Excellence

- We establish high standards and expectations for ourselves and our co-workers. We are never satisfied with the current level of performance but instead seek the next level.
- We use our performance improvement programs and processes, including training, to continuously improve plant performance. We find our problems before they find us.

#### Accountability

- We ensure understanding of standards and expectations and our ability to meet them.
- We visibly hold ourselves and others responsible for meeting our standards, achieving our goals and living our core values. We promptly correct performance shortfalls that challenge our mission.

#### Mutual Respect and Trust

- We value our co-workers and recognize what they contribute to the operation of the plant.
- We emphasize positive reinforcement of desired behaviors and successes.
- We sincerely consider input and feedback on matters important to others.
- We are fair and consistent and care about each other as people.

### Wolf Creek Operational Focus Philosophy

*Operators operate  
the plant safely . . .*

*The rest of us give them  
a safe plant to operate*

### Wolf Creek Accountability Model

We are an engaged, thinking organization  
(SOER 10-2)



Use the Accountability Scorecard for observations.

Rev. 1, 03/19/12



### Station-Wide Fundamental Behaviors

#### Definition of fundamental:

*Serving as, or being an essential part of, a foundation or basis*

Because nuclear technology is special and unique, working at a nuclear power plant is like no other job in the country. We are entrusted by our community, our state, our nation to respect the technology and operate the plant safely and reliably. To meet this obligation, as nuclear workers, we must hold ourselves to a higher standard in terms of our performance. To do that we must understand the fundamental behaviors that we need to exhibit every day. By providing clear guidance and making certain we are working to these fundamentals, we can meet our mission for years to come.

We need every division striving to close our performance gaps to achieve improved performance. We recognize that meeting our own division's fundamental behaviors and following expected site-wide fundamental behaviors are key to achieving our mission.

#### Wolf Creek Excellence =

Station-wide Fundamental Behaviors +  
Division-specific Fundamental Behaviors



# Wolf Creek Station-Wide Fundamental Behaviors

## Nuclear Safety—Operational Focus

- We support the Shift Manager who has ultimate authority over all plant activities and operations.
- We manipulate plant equipment only when authorized and directed by plant procedures or written instructions.
- We ensure we understand the impact or potential impact of tasks on plant operation and take actions to minimize errors.
- We promptly report issues that could adversely affect plant operation.
- We inform the Shift Manager of issues that require immediate actions to address operational risk or safety margin concerns.
- We use error-reduction practices, think and stay focused on the task to avoid challenging plant operation.
- We schedule work to maximize the availability and reliability of station equipment and systems.
- We manage nuclear, radiological, and personal risk by working our schedule.

## Industrial Safety

- We take responsibility for our own safety and that of our co-workers.
- We follow our safety requirements.
- We assess conditions before starting a work activity.
- We recognize, report and correct unsafe work conditions.
- We use the necessary personal protective equipment to keep our bodies safe.
- We sign on to the right Clearance Order and verify the boundary is safe for the task.
- We recognize and reinforce individuals for their safe work practices.
- We follow and exceed good housekeeping practices.
- We report injuries and near misses, no matter how minor.

## Radiation Safety

- We ensure we are on the right Radiation Work Permit, and we understand what the permit allows us to do.
- We understand the radiological considerations of the work we are performing, including whether we will breach a contaminated system or enter a contaminated area.

- We know our work area's dose rates and contamination levels.
- We obey all postings and never alter radiological boundaries.
- We practice ALARA by adhering to the following principles.
  - We pre-plan our work to minimize dose.
  - We move work to lower dose waiting areas and do not loiter.
  - We use the minimum number of workers required to do the job.
  - We use the right tool for the job to ensure we work efficiently.
  - We maximize the distance between ourselves and radiation sources.
- We minimize radioactive waste by limiting the material we take into the Radiological Controlled Area and practicing good housekeeping.
- We minimize and control the spread of contamination.

## Human Performance

- We understand and properly use error-prevention tools.
- We recognize error-likely situations when preparing for and executing work and take actions to mitigate them.
- We use pre-job briefs to discuss the impact our job could have on nuclear safety, lessons we can learn from operating experience, the expected environment we expect to find in the field and the expected outcome from our task.
- We answer the question, "What's the worst that could happen," and put measures in place to prevent it from happening.
- We follow procedures and work instructions as written and according to the level of use requirements and use placekeeping.
- We obtain clarification when unsure and stop if plant conditions are not as expected.
- We use self-check (STAR) for component identification and equipment manipulation.
- We use peer checking to ensure we correctly execute unrecoverable steps.
- We use the 2-Minute Drill to enhance our situational awareness of the job site conditions, re-focus on the task to be performed and ensure conditions are the way they were discussed in the pre-job brief.

## Problem Identification and Resolution

- We use the Corrective Action Program, self-assessments, operating experience, benchmarking, and performance indicators to improve our performance.
- We maintain a low threshold for reporting problems and adverse conditions. We find issues before they find us.
- We effectively and efficiently evaluate our issues so that we can fix them.
- We quickly address issues that are easy to fix and place the right amount of resources to other more complex issues according to their safety significance.
- We use rigor and conservative decision making in our evaluations, especially those that are important to maintain nuclear safety, safety margin or plant reliability.
- We identify and implement timely corrective actions to prevent recurrence and verify the effectiveness of those actions.

## Safety-Conscious Work Environment

- We know we can raise any issue without fear of discrimination, intimidation, harassment or retaliation.
- We know the various ways we can raise a concern.
- We encourage others to raise concerns about issues they identify and listen to and confirm each other's issues and concerns.
- We provide and seek follow-up on how issues were resolved.

## Training

- We attend and participate in training.
- We provide feedback on training to improve its quality.
- We perform activities for which we are qualified.
- We assess our work performance and write Training Needs Analyses for gaps and opportunities to improve.
- We are intrusive in evaluating indicators of training health to ensure we are continuously improving our training programs.
- We evaluate our performance and strategic goals to identify training solutions that enhance the safe, reliable operations and support performance improvement.
- We participate in or provide input to training oversight committees.
- We partner with the Training division in analyzing, designing, developing, implementing and evaluating training following the ADDIE process.