



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 E LAMAR BLVD
ARLINGTON, TX 76011-4511

September 2, 2014

Adam C. Heflin, President and
Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KS 66839

**SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR WOLF CREEK GENERATING
STATION (REPORT 0500482/2014006)**

Dear Mr. Heflin:

On August 12, 2014, the NRC completed its mid-cycle performance review of Wolf Creek Generating Station. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2013, through June 30, 2014. This letter informs you of the NRC's assessment of Wolf Creek Generating Station during this period and its plans for future inspections at that facility.

The NRC determined that overall, Wolf Creek Generating Station was operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at Wolf Creek Generating Station during the most recent quarter was within the Regulatory Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because of one Greater-than-Green Security Cornerstone input and one White finding in the Emergency Preparedness Cornerstone. The Security issue was described in Inspection Report 05000482/2014405 (ADAMS ML14069A025), and the White Emergency Preparedness finding, associated with a failure to maintain adequate methods for assessing the potential consequences of a radiological emergency condition, was described in Inspection Report 05000482/2014503 (ADAMS ML14182A628). The NRC issued a Follow-Up Assessment letter dated March 26, 2014, (ADAMS ML14085A376) to inform you of your movement from the Licensee Response Column to the Regulatory Response column of the NRC's Action Matrix.

In addition to ROP baseline inspections, the NRC plans to conduct supplemental inspections in accordance with Inspection Procedure 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area," when you inform us of your readiness for these inspections. The objectives of this inspection procedure are to provide assurance that, for risk-significant performance issues: (1) the root causes and contributing causes are understood; (2) the extent of condition and extent of cause are identified; and (3) the licensee's corrective actions are sufficient to address the root and contributing causes and prevent recurrence.

These supplemental inspections will separately review your actions to address the Greater-than-Green Security Cornerstone input and White finding in the Emergency Preparedness Cornerstone.

The NRC also issued a Chilling Effect Letter (CEL) (ADAMS ML13233A208) to Wolf Creek Nuclear Operating Corporation on August 19, 2013. The CEL was issued because the Occupational Safety and Health Administration (OSHA) had issued a finding of discrimination for raising safety concerns against a former employee of an engineering contractor employed by Wolf Creek Nuclear Operating Corporation, and due to the NRC identifying that a chilled work environment existed within your facility's Quality Assurance Group. Issuance of a CEL meets the NRC criteria in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," for the identification of a cross-cutting theme in the area of safety conscious work environment (SCWE). The NRC has assessed your 30-day and 6-month responses to the CEL, and conducted a public meeting in the Region IV office on January 22, 2014, to discuss the actions that you are taking to address the working environment at your facility. The NRC has decided not to open a substantive cross-cutting issue in the area of SCWE at this time because the NRC staff does not have a concern with your actions. This theme will continue to be reviewed during the next performance assessment as we continue to monitor your staff's actions to ensure Wolf Creek Generating Station is a workplace that fosters an environment where employees feel free, and are encouraged, to raise safety concerns. The NRC will conduct a follow-up inspection to review your actions to address the CEL when you inform us of your readiness for inspection.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised. All cross-cutting aspects identified during inspections conducted in calendar year 2014 reflect this revision to Inspection Manual Chapter (IMC) 0310. Cross-cutting aspects identified in 2013 using the 2013 terminology were converted to the latest revision in accordance with the cross-reference in IMC 0310 during the mid-cycle assessment review and evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305.

The enclosed inspection plan lists the inspections scheduled through December 31, 2015. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections scheduled to be conducted during the last nine months are tentative and may be revised based on the results of the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact your staff as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security related inspections, which will be sent via separate, non-publicly available correspondence.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite

component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for the first unit at each site, and will aid staff in development of an ultimate Safety Evaluation for the site. The date for the onsite component at your site is being coordinated with your staff. A site-specific audit plan for the visit will be provided in advance to allow sufficient time for preparations.

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

Please contact Mr. Neil F. O'Keefe at 817-200-1141 with any questions you may have regarding this letter.

Sincerely,

/RA/

Troy W. Pruett, Acting Director
Division of Reactor Projects

Docket No.: 50-482
License No.: NPF-42

Enclosure: Wolf Creek Generating
Station Inspection/Activity Plan

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DISTRIBUTION:

See next page

ADAMS ACCESSION NUMBER: ML14239A622

<input checked="" type="checkbox"/> SUNSI Review By: NOKeefe		ADAMS <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive	
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SIGNATURE	/RA/	/RA/VGaddy for	/RA/				
DATE	8/21/14	8/25/14	8/25/14				

OFFICIAL RECORD COPY

Letter to Adam C. Heflin from Troy W. Pruett dated September 2, 2014

SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR WOLF CREEK GENERATING
STATION (REPORT 05000482/2014006)

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Electronic Distribution for Wolf Creek Generating Station

Wolf Creek
Inspection / Activity Plan
09/01/2014 - 12/31/2015

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
Start	End				
EXAM - INITIAL OPERATOR EXAM					
					5
1	10/19/2015	10/23/2015	X02549	INITIAL EXAM WC(11/2015)	
1	11/16/2015	11/20/2015	X02549	INITIAL EXAM WC(11/2015)	
INSP - BIENNIAL REQUAL INSPECTION					
					3
1	10/06/2014	10/10/2014	IP 7111111B	Licensed Operator Requalification Program	
EB2-05T - TRIENNIAL FIRE PROTECTION INSPECTION					
					4
1	10/20/2014	10/24/2014	IP 7111105T	Fire Protection [Triennial]	
1	11/03/2014	11/07/2014	IP 7111105T	Fire Protection [Triennial]	
EP-1 - EP PERFORMANCE INDICATORS					
					1
1	11/17/2014	11/21/2014	IP 71151-EP01		
1	11/17/2014	11/21/2014	IP 71151-EP02		
1	11/17/2014	11/21/2014	IP 71151-EP03		
EP-2 - EP PROGRAM INSPECTION					
					1
1	11/17/2014	11/21/2014	IP 7111402	Alert and Notification System Testing	
1	11/17/2014	11/21/2014	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1	11/17/2014	11/21/2014	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	11/17/2014	11/21/2014	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
RS 13 PI - RADIATION SAFETY					
					2
1	03/02/2015	03/06/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	03/02/2015	03/06/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1	03/02/2015	03/06/2015	IP 71151-OR01		
1	03/02/2015	03/06/2015	IP 71151-PR01		
71111.08 - INSERVICE INSPECTION					
					1
1	03/09/2015	03/20/2015	IP 7111108P	Inservice Inspection Activities - PWR	
RS 24 - RADIATION SAFETY					
					2
1	06/22/2015	06/26/2015	IP 71124.02	Occupational ALARA Planning and Controls	
1	06/22/2015	06/26/2015	IP 71124.04	Occupational Dose Assessment	
EB1-17T - WC PERMANENT PLANT MODS & 50.59					
					1
1	07/06/2015	07/17/2015	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	
EP-2 - HAB EXERCISE INSPECTION					
					5
1	11/16/2015	11/20/2015	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	11/16/2015	11/20/2015	IP 7111407	Exercise Evaluation - Hostile Action (HA) Event	
EP-3 - EP PERFORMANCE INDICATORS					
					2
1	11/16/2015	11/20/2015	IP 71151-EP01		

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.

Wolf Creek
Inspection / Activity Plan
09/01/2014 - 12/31/2015

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
EP-3 - EP PERFORMANCE INDICATORS					2
1	11/16/2015	11/20/2015	IP 71151-EP02		
1	11/16/2015	11/20/2015	IP 71151-EP03		