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Manager Regulatory Affairs

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RA 16-0038

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: Docket No. 50-482: Revision of Two Procedures and One Form that Implement the Radiological Emergency Response Plan (RERP) for Wolf Creek Generating Station (WCGS)

Gentlemen:

Two procedures and one form that implement the WCGS RERP have been revised. The revised documents are identified below:

<u>Procedures</u>	<u>Effective Dates</u>	<u>Form</u>	<u>Effective Date</u>
AP 06-004, Rev. 3	March 22, 2016	EPF 06-018-06, Rev. 10	March 28, 2016
EPP 06-001, Rev. 24	March 22, 2016		

The attached summary of the changes to the implementing procedures and to the implementing form explains that these changes do not reduce the effectiveness of the WCGS RERP. This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4204.

Sincerely,

Cynthia R. Hafenstine

CRH/rlt

Attachment: Summary of Changes to Two Procedures and One Form That Implement the Wolf Creek Generating Station (WCGS) Radiological Emergency Response Plan (RERP)

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Summary of Changes to Two Procedures and One Form That Implement the Wolf Creek Generating Station (WCGS) Radiological Emergency Response Plan (RERP)

1. Procedure AP 06-004, "Equipment Important to Emergency Response," Rev. 3

Step 1.3 clarifies that procedure AP 06-004 does not supersede or replace conditions and required actions described in the WCGS Technical Specifications (T/S). The change to step 1.3 also states that compensatory measures and restoration criteria specified by procedure AP 06-004 could be more limiting than WCGS T/S, the WCGS Technical Requirements Manual, the WCGS Offsite Dose Calculation Manual and the WCGS Fire Protection Program.

Definitions, references and guidance have been added to multiple steps in accordance with Nuclear Energy Institute (NEI) 13-01, "Reportable Action Levels for Loss of Emergency Preparedness Capabilities," which was endorsed by the Nuclear Regulatory Commission in NUREG-1022, revision 3, supplement 1. NEI 13-01 provides a recommended and uniform approach that supports consistent application of the event reporting guidance associated with a loss of emergency preparedness capabilities.

Steps 5.4.5, 6.1.1.9 and A.4 in Attachment A were revised to enhance the guidance for assigning priority for repairing and returning emergency response equipment to service. This guidance considers using the classification of a "shift manager concern" to increase the station emphasis on repair of emergency response equipment.

Guidance has also been added to multiple sub-steps in step 6 to enhance the reporting information associated with availability of sirens and to enhance the guidance for responding to planned or unplanned loss of emergency response facilities and equipment. The title of Figure 1 has been changed to "Unplanned Loss of Emergency Response Facilities and Equipment," and the title of Figure 2 has been changed to "Planned Loss of Emergency Response Facilities and Equipment."

Multiple changes were made to steps in Attachment A, "Emergency Response Facility Compensatory Measures," to update the information for equipment in the Technical Support Center (TSC) and Emergency Operations Facility (EOF). Attachment B, "Emergency Response Sirens Compensatory Measures," has been revised at steps B.3 and B.4 to enhance guidance for notifying the NRC and Coffey County when sirens are out of service. Attachment C, "Emergency Response Equipment Compensatory Measures," has been revised to increase the guidance and emphasis on repairing emergency response equipment and to update the information in step C.4, "Equipment Important to Emergency Response."

The changes to procedure AP 06-004 provide additional guidance to ensure that equipment important to emergency response is maintained, that compensatory measures are implemented as needed and that reporting requirements are met. Therefore, the changes to procedure AP 06-004 do not reduce the effectiveness of the WCGS RERP.

2. Procedure EPP 06-001, "Control Room Operations," Rev. 24

New step 7.2.10 has been added to enhance the transfer of responsibility and authority for the emergency from the Shift Manager to the Site Emergency Manager. A direct telephone extension for the EOF Operations Recorder has been added to step 7.7.2.c so it is not necessary to make a long distance call. Multiple steps have been changed to make conditional action statements comply with station procedure writer requirements.

The changes to procedure EPP 06-001 provide additional guidance for the Shift Manager to use when transferring responsibility and authority for an emergency to the Site Emergency Manager and enhance communication capabilities. Therefore, these changes do not reduce the effectiveness of the WCGS RERP.

3. Form EPF 06-018-06, "Emergency Planning Monthly Communications Checklist," Rev. 10

A spelling error was corrected in the Notification Verification section for the EOF in Part 1 and the TSC Code Word Verification section was added to Part II. The first change to form EP 06-018-06 is editorial in nature and the second change supports notifications made to the Control Room from the TSC. Therefore, these changes do not reduce the effectiveness of the WCGS RERP.