



Cleveland Reasoner
Senior Vice President and Chief Nuclear Officer

January 15, 2019
WM 19-0001

U. S. Nuclear Regulatory Commission
ATTN: Nicole G. Coleman
Enforcement Specialist
Office of Enforcement
Mail Stop: 14B46
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Reference: Letter WM 18-0045, dated September 17, 2018, from C. Reasoner,
WCNOC, to USNRC

Subject: Confirmation of the Completion of Pre-Decisional Enforcement Conference
Actions

Dear Ms. Coleman,

On September 10, 2018, Wolf Creek Nuclear Operating Corporation (WCNOC) participated in a pre-decisional enforcement conference (PEC) with the Nuclear Regulatory Commission (NRC) to discuss Apparent Violation EA-18-037. During the PEC, WCNOC agreed to provide supplemental information to the NRC. The Reference provided this supplemental information, which included corrective actions that were requested by the NRC during the PEC, volunteered by the station during the PEC, or were already being taken by WCNOC. These actions are captured in Condition Report (CR) 125270.

The purpose of this letter is to notify the NRC that the corrective actions documented in the Reference and in CR 125270 have been completed. These actions include:

- SCWE (Safety Conscious Work Environment) training for WCNOC Executive Team.
- Procedural enhancements for the Personnel Action Review Board.
- Development of a comprehensive WCNOC SCWE strategy and initiation of implementing actions. These actions are identified in the WCNOC Business Plan and will be documented in our corrective action program.

A description of the action closures are in the Attachment.

WCNOC has taken additional actions to improve the SCWE after the PEC. These include:

- SCWE site-wide stand down
- SCWE training for the WCNOC leadership team that includes supervisor oral boards and dynamic learning activities

The stand down talking points are provided in the Attachment.

Additionally, for the purpose of continuous improvement, WCNOC has incorporated the following initiatives into the 2019 Business Plan:

- SCWE
- Professional to the Core

These initiatives are intended to improve behaviors from a collective commitment by leaders and individuals to emphasize safety and ensure protection of station personnel.

Lastly, WCNOC has initiated a root cause analysis effort to examine the cause(s) associated with the EA-18-037 violation and determine if additional actions are required for complete resolution. CR 128909 has been initiated for this evaluation.

WCNOC will not contest the EA-18-037 violation or civil penalty, and notified the NRC of this decision by electronic mail on January 2, 2019.

A draft copy of this letter and additional supporting documentation were used to brief the resident inspectors on January 11, 2019.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4000, or Mr. Ron Benham at (620) 364-4204.

Sincerely,

A handwritten signature in black ink, appearing to read "Cleveland Reasoner", written in a cursive style.

Cleveland Reasoner

COR/rlt

Attachment: Action Closure Description

cc: George Wilson (NRC), w/a

Action Closure Description

1. Action 125270-03-03: Training for Executive Leaders on SCWE

On December 6, 2018, attorneys with Hogan Lovells Law Firm provided training to Wolf Creek Nuclear Operating Corporation (WCNOC) Executives (Chief Executive Officer, Chief Nuclear Officer, Site Vice President and Vice President (VP) Engineering), Plant Manager, Directors, and the managers of Human Resources, Organizational Performance and Strategic Projects. This training included:

- Nuclear Safety Culture Basics and Traits,
- Fostering a Safety Conscious Work Environment (SCWE),
- SCWE and Everyday Activities, and
- What are my Responsibilities for SCWE and Nuclear Safety Culture?

2. Action 125270-03-04: Expanding and Clarifying the Use of the Personnel Action Review Board (PARB), Procedure AI 13C-003

Procedure AI 13C-003, Revision 5, Personnel Action Review Board (PARB) was released on September 17, 2018, under Document Revision Request (DRR) 18-1460. Revision 5 of AI 13C-003 now requires a PARB review within 2 business days of employees or supplemental personnel being placed on administrative leave.

3. Action 125270-03-05: Action that WCNOC Legal Department will be Looped in with HR Investigations Involving SCWE, Procedure AI 13C-003

Procedure AI 13C-003, Revision 6, Personnel Action Review Board (PARB) was released on December 13, 2018, under DRR 18-1860. Revision 6 of AI 13C-003 now requires:

- WCNOC management to inform both the VP Engineering and legal counsel prior to taking personnel action,
- WCNOC management to inform both the VP Engineering and legal counsel upon becoming aware of any issue affecting an employee that involves any allegations of harassment, intimidation, retaliation, or discrimination, or allegations of actions that have a potential to result, or have resulted in, a violation of regulatory requirements.

4. Action 125270-03-06: CNO Led "SCWE Strategy" Initiative

The SCWE Strategy was released December 13, 2018, and recognizes SCWE as the cornerstone for the sustainability of a strong nuclear safety culture. The strategy contains the following elements: (1) expected responsibilities and

behaviors, (2) ongoing training, (3) a communications plan that will include CNO face to face meetings, (4) ongoing monitoring, and (5) oversight. Through the implementation of this SCWE Strategy and related action plans within Initiative #1 of our 2019-2021 Drive to Excellence business plan, our future state will be achieved.

5. Additional Actions taken to improve SCWE

A site-wide stand down was conducted. The talking points contained the following elements: (1) what is a nuclear safety culture, (2) what is a safety conscious work environment, (3) industry history, (4) raising safety concerns, (5) methods for reporting, (6) environment for raising concerns, (7) what happens after a concern is reported.