



Jaime H. McCoy
Site Vice President

December 23, 2019

WO 19-0059

Mr. Scott Morris
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Reference: Letter dated July 18, 2019, from S. A. Morris, USNRC, to A. C. Heflin, WCNO, Confirmatory Order, NRC Inspection Report 05000482/2019010 and NRC Investigation Report 4-2018-008

Subject: Docket No. 50-482: Wolf Creek Nuclear Operating Corporation's Summary of Actions Implemented for EA-18-165, "Confirmatory Order, NRC Inspection Report 05000482/2019010 and NRC Investigation Report 4-2018-008"

Dear Mr. Morris,

On July 18, 2019, the Nuclear Regulatory Commission (NRC) issued Order EA-18-165 to Wolf Creek Nuclear Operating Corporation (WCNO). The Reference summarizes corrective actions already taken by WCNO that were discussed in the Alternative Dispute Resolution and additional commitments made in the preliminary settlement agreement.

Item Q in the Reference requires the submission in writing of the actions implemented under this Confirmatory Order, the results achieved, and any additional corrective actions initiated as a result of this Confirmatory Order. Six items have been completed and a summary of the action closures are provided in the attachment to this letter. Further work continues for development of closure packages for the actions to support closure board review for completeness and effectiveness as well as aid in the inspection process.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4156, or Ron Benham (620) 364-4204.

Sincerely,

A handwritten signature in black ink that reads "Jaime H McCoy". The signature is written in a cursive, flowing style.

Jaime H. McCoy

JHM/rlt

Attachment: Wolf Creek Nuclear Operating Corporation's (WCNOC) Summary of Actions Implemented for EA-18-165, "Confirmatory Order, NRC Inspection Report 05000482/2019010 and NRC Investigation Report 4-2018-008"

cc: B. K. Singal (NRC), w/a
N. O'Keefe (NRC), w/a
Document Control Desk (NRC), w/a
Senior Resident Inspector (NRC), w/a

ADAMS ACCESSION NO. ML20007E070

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Jaime H. McCoy, of lawful age, being first duly sworn upon oath says that he is Site Vice President of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the contents thereof; that he has executed the same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Jaime H McCoy
Jaime H. McCoy
Site Vice President

SUBSCRIBED and sworn to before me this 23rd day of December, 2019.



Gayle Shephard
Notary Public

Expiration Date 7/24/2023

Wolf Creek Nuclear Operating Corporation's (WCNOC) Summary of Actions Implemented for EA-18-165, "Confirmatory Order, NRC Inspection Report 05000482/2019010 and NRC Investigation Report 4-2018-008"

The following is a summary of actions implemented under Confirmatory Order EA-18-165 (Item Q). The Confirmatory Order commitments are being tracked in the Corrective Action Program under Condition Report (CR)134185.

Closed Actions	Commitment	Summary
<p>Item A (134185-01-01, due date 8/20/2019)</p> <p>134185-01-01 was closed in Asset Suite on 8/20/2019.</p>	<p>Within 1 month of the issuance date of the Confirmatory Order, Wolf Creek will issue a stand-alone communication from the Chief Nuclear Officer to all employees and contractor personnel that willful violations will not be tolerated. The communication will stress the importance of procedural adherence, ensuring that documents are complete and accurate, and of potential consequences for engaging in willful violations. This message will be balanced with the recognition that people do make mistakes and when that happens, it is Wolf Creek's expectation that its employees and contractors will identify and document issues in accordance with licensee procedures.</p>	<p>On 8/14/2019, the Chief Nuclear Officer (CNO) released a Corporate Communications stand-alone electronic mail message to WCNOC employees that reiterated that willful violations will not be tolerated, stressed the importance of procedural adherence and consequences for willful violations, recognized that people make mistakes, and that employees/contractors should identify and document issues in accordance with procedures.</p> <p>After this initial communication was electronically mailed, it was recognized that not all supplemental personnel, particularly those without site e-mail access, received the CNO's message. CR 135634 was initiated on 9/17/2019.</p> <p>To address CR 135634, the initial CNO communication was sent through the U.S. Postal Service. Active WCNOC employees' addresses were obtained through the Human Resources program People Soft, and supplemental personnel's mailing addresses were obtained from Access Screening. A total of 1,776 letters were mailed (863 active WCNOC employees and 913 supplemental personnel.) The letters were taken to the Burlington, KS Post Office on 10/15/2019. CR 135634 was closed on 10/29/2019.</p>

Closed Actions	Commitment	Summary
<p>Item B (134185-01-02, due date 11/15/2019)</p> <p>134185-01-02 was closed in Asset Suite on 11/14/2019.</p>	<p>Within 4 months of the issuance date of the Confirmatory Order, Wolf Creek will hold meetings with all employees and long-term contractor personnel to address integrity and trustworthiness. The meetings will: (1) stress the importance of procedural adherence, ensuring that documents are complete and accurate, and of potential consequences for engaging in willful violations; (2) describe the circumstances of this case, the results of the root cause evaluation, and Wolf Creek's corrective actions; (3) include the expectation to immediately raise safety concerns when observed; (4) address how to proceed when work order documentation is incomplete.</p>	<p>Leadership held meetings with all Wolf Creek employees and long-term contractor personnel to address integrity and trustworthiness, based on the material provided through an 8/27/2019 Leaders Digest communication. This material included Talking Points and a Treat Your Signature as Your Word presentation, which included a video from the CNO.</p> <p>Through the use of the Talking Points, the meetings and presentation 1) stressed the importance of procedural adherence, ensuring documents are complete/accurate, and of potential consequences for engaging in willful violations; 2) described the circumstances of the case, results of the root cause and Wolf Creek's corrective actions; 3) included the expectation to immediately raise safety concerns when observed; 4) addressed how to proceed when Work Order documentation is incomplete.</p> <p>Evidence of meetings resides in the attendance sheets that were used to track completion.</p>

Closed Actions	Commitment	Summary
<p>Item C (134185-01-03, due date 11/15/2019)</p> <p>134185-01-03 was closed in Asset Suite on 11/14/2019.</p>	<p>Within 4 months of the issuance date of the Confirmatory Order, Wolf Creek will reinforce expectations with regards to 10 CFR 50.9, completeness and accuracy of information, and 10 CFR 50.5, deliberate misconduct, by providing an overview of the last 5 years of pertinent NRC enforcement actions with Operations, Fire Watch, Maintenance, and Radiation Protection staff.</p>	<p>CERTREC provided a list of 10 CFR 50.9 and 10 CFR 50.5 violations and enforcement actions for the last 5 years, as of 10/22/2019. An additional column was added to identify the pertinent departments that need to review each example.</p> <p>On 10/31/2019, a common database export of active WCNOE employees was pulled to identify personnel within the Operations, Maintenance and Radiation Protection (RP) departments. The Qual Tool was then used to identify personnel with a Fire Watch qualification, so that they could be pulled into the spreadsheet for proper coverage in this action. There were 508 employees identified.</p> <p>An email communication, with the CERTREC results attached, was sent to the leadership of those identified as Operations, Fire Watch, Maintenance and RP. Talking points were also provided, and included details of the proposed violation, summaries of the CERTREC results by pertinent departments and final takeaways. This communication was to be discussed in morning meetings or regularly scheduled staff meetings to reinforce expectations and the significance of accurate and complete documentation with their applicable personnel.</p> <p>An additional email communication was then sent to the 508 Operations, Fire Watch, Maintenance and RP personnel (including the talking points and CERTREC results) to reinforce the significance of accurate and complete documentation.</p>

Closed Actions	Commitment	Summary
<p>Item G (134185-01-07, due date 10/16/2019)</p> <p>134185-01-07 was closed in Asset Suite on 10/15/2019.</p>	<p>Within 3 months of the issuance date of the Confirmatory Order, Wolf Creek will complete a root cause analysis of the circumstances that led to the incomplete and inaccurate information violation and develop corrective actions.</p>	<p>Condition Report 131147 was written on 3/27/2019 to document a potentially escalated greater than Severity Level IV Traditional Enforcement violation concerning the failure to meet 10CFR50.9, Completeness and accuracy of information. This CR was screened as a Root Cause. The root cause analysis was completed and approved by the Corrective Action Review Board (CARB) on 5/28/2019. The evaluation was closed on 6/12/19.</p> <p>On 8/20/2019, CR 134871 was initiated due to a review of the root cause analysis determining that changes to the document, including an additional contributing cause, would provide a more complete analysis. Revision 1 of the root cause analysis was completed and approved by CARB on 10/14/2019.</p> <p>The root cause was determined to be the Control Rod Drive Mechanism (CRDM) installation and removal status was not formally tracked by either work order. The corrective action to prevent recurrence (CAPR) was to revise procedure MCM BB-007, "Installation and Removal Canopy Seal Clamp Assemblies (CSCA)," to incorporate a step in the prerequisites to state that if CRDMs/Digital Rod Position Indicators (DRPIs) are to be removed during the evolution, then the implementing work order shall provide a formal method for tracking and verification of which CRDMs/DRPIs are removed and re-installed on the reactor vessel head: Revision 7 of MCM BB-007 was released on 6/25/2019 to address the CAPR.</p>

Closed Actions	Commitment	Summary
<p>Item I (134185-01-09, due date 11/15/2019)</p> <p>134185-01-09 was closed in Asset Suite on 11/13/2019.</p>	<p>Within 4 months of the issuance date of this Confirmatory Order, Wolf Creek will provide in-person training to station staff (employees and long-term contractors) that emphasizes expectations for completeness and accuracy in documentation, the expectation to stop when unsure, the expectation to write a condition report if encountering unexpected conditions, and what it means when an individual signs or initials a document. Wolf Creek will add training on these subjects to initial or "onboarding" training. The scope of the initial training may differ between Wolf Creek employees and contractors.</p>	<p>Accuracy and Completeness of Documentation training was held for all badged personnel (including supplementals) in July and August 2019, with a schedule of 31 regular class offerings. There were also specific sessions for Operations, and sessions were built into existing cycle training for Maintenance, RP and Security. Evidence of training completion was tracked.</p> <p>This training provided a) expectations for completeness and accuracy in documentation; b) the expectation to stop when unsure; c) the expectation to write a CR if encountering unexpected conditions; and d) what it means when an individual sign's or initials a document.</p> <p>Accuracy and Completeness of Documentation has been added to the onboarding training that occurs for new personnel, which includes long-term contractors (> 180 days).</p>

Closed Actions	Commitment	Summary
<p>Item N (134185-01-14, due date 11/15/2019)</p> <p>134185-01-14 was closed in Asset Suite on 11/04/2019.</p>	<p>Within 4 months of the issuance date of the Confirmatory Order, Wolf Creek will conduct a nuclear safety culture survey developed by a third-party.</p>	<p>A Nuclear Safety Culture Survey was conducted June/July 2019 using the Utilities Service Alliance (USA) survey method. The survey was followed by a Nuclear Safety Culture Assessment (NSCA) conducted August 12-15, 2019. The NSCA was led by a member of USA with the team consisting of both external peers and WCNOE employees. The final NSCA report was received on 9/12/ 2019. Overall, the assessment team noted that WCNOE has a safety culture that supports all INPO Traits of a Healthy Nuclear Safety Culture, has a respect for nuclear safety, and assures that nuclear safety is not compromised by production priorities. There were no Strengths or Weaknesses identified. Condition reports were generated for the Negative, Positive and General Observations.</p>

Results Achieved:

- 1) Increased site awareness through written and electronic communication that willful violations will not be tolerated, the importance of procedural adherence, ensuring that documents are complete and accurate, the potential consequences for engaging in willful violations, and the expectation to identify and document issues.
- 2) Increased site awareness of 10 CFR 50.5, Deliberate misconduct and 10 CFR 50.9, Completeness and accuracy of information, with Operations, Fire Watch, Maintenance and RP staff through electronic communication and leadership meetings with their reports.
- 3) Completed the corrective action to prevent recurrence to address the root cause of the escalated violation.
- 4) Provided in-person training to WCNOG personnel and long-term contractors that emphasized the expectation for completeness and accuracy in documentation, the expectation to stop when unsure, the expectation to write a condition report if encountering unexpected conditions, and what it means when an individual signs or initials a document.
- 5) Added Accuracy and Completeness of Documentation to onboarding training for new personnel.
- 6) Determined that WCNOG has a safety culture that supports all INPO Traits of a Healthy Nuclear Safety Culture, has a respect for nuclear safety, and assures that nuclear safety is not compromised by production priorities.

Condition Report References:

1. Condition Report 131147, "Proposed Greater Than SLIV Traditional Enforcement Violation"
2. Condition Report 134185, "Confirmatory Order Letter Receipt and Action Tracking"
3. Condition Report 134871, "Issue with Documentation Practices"
4. Condition Report 135634, "Confirmatory Order Action A Concern"