WOLF CREEK
NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

September 27, 1991
WM 91-0136

U. S. Nuclear Regulatory Commission
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Reference: Letter dated August 28, 1991 from S. J. Collins, NRC to B. D. Withers, WCNOC
Subject: Docket No. 50-482: Response to Violation 482/9116-01 and Exercise Weakness 482/9116-02

Gentlemen:

This letter provides Wolf Creek Nuclear Operating Corporation's (WCNOC) response to Violation 482/9116-01 and Exercise Weakness 482/9116-02. Violation 482/9116-01 involved changes to the emergency plan which decreased the effectiveness of the plan that should not have been implemented without prior approval by the Commission. Exercise Weakness 482/9116-02 involved the failure of operating crews to demonstrate the capability to provide accurate dose assessments early in a simulated emergency using information and assets available.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff.

Very truly yours,

Bart D. Withers
President and
Chief Executive Officer

BDW/aem

Attachment

cc: L. L. Gundrum (NRC), w/a
A. T. Howell (NRC), w/a
R. D. Martin (NRC), w/a
W. D. Reckley (NRC), w/a
D. B. Spitzberg (NRC), w/a

Violation (482/9116-01): Failure to Determine NRC Approval was Required for an Emergency Plan Change

Finding:

10 CFR 50.54(q) requires, in part, that the licensee may make changes to the emergency plan without Commission approval only if the changes do not decrease the effectiveness of the plan, and the plan, as changed, continues to meet the requirements of Appendix E to this part. Proposed changes that decrease the effectiveness of the approved emergency plan may not be implemented without application to and approval by the Commission.

Contrary to the above, the inspectors determined that changes made to the licensee's emergency classification scheme in the emergency plan change submittal of January 3, 1991, decreased the effectiveness of the plan that should not have been implemented without prior approval by the Commission. Specifically, the change to the emergency classification scheme assigned a significantly lower classification than required for conditions involving an explosion in a vital area effecting safe shutdown equipment.

Reason for Violation:

The change to the Emergency Action Level (EAL) was initiated as a procedure change to EPP 01-2.1, "Emergency Classification," at the request of operations personnel to clarify the Notice of Unusual Event (NUE) EAL for an explosion in a vital area. The 10 CFR 50.54(q) evaluation for the procedure did not identify a decrease to the effectiveness of the plan. The change was then incorporated into the annual revision of the Radiological Emergency Response Plan (RERP) and again failed to identify it as a decrease to the effectiveness of the plan. Therefore, the revision to the EAL was not thoroughly reviewed in accordance with 10 CFR 50.54(q). Changes to the RERP or procedures were required, by procedure EPP 02-1.1, "Emergency Planning Program," to receive a 10 CFR 50.54(q) evaluation. This was accomplished and documented on form EP 02-1, "E-Plan/EPP Revision Form." Item C, on the form provided a place for the Manager Emergency Planning to indicate a yes or no answer that the proposed revision decreased the effectiveness of the plan. Use of this form by Emergency Planning personnel to conduct the 10 CFR 50.54(q) review for procedure or RERP changes did not adequately foster the review process nor identify steps to be taken to ensure compliance with 10 CFR 50.54(q). Instead, the Emergency Planning personnel relied on memory of guidance and past procedure or RERP revisions. The absence of an item checklist format did not encourage an adequate 10 CFR 50.54(q) review on procedures or RERP changes. In addition, form EP02-1 relies on a singular check of the evaluation which places the entire responsibility for the 10 CFR 50.54(q) review on one person.

Corrective Steps Which Have Been Taken and Results Achieved:

The RERP and Procedure EPP 01-2.1 were revised to revert to the wording previously approved by the Commission. Form EP 02-1, "E-Plan/EPP Revision Form," was revised to expand and provide guidance on the 10 CFR 50.54(q) review process. The revised form will promote a more thorough review to ensure compliance with 10 CFR 50.54(q). This form also assures procedure and RERP changes receive the same administrative controls.

Previous RERP and procedure changes were reviewed again for changes to EALs which may have decreased the effectiveness of the plan. This review determined no other changes to EALs have reduced the effectiveness of the plan.

In addition, procedure EPP 02-1.1 was revised to ensure procedure changes which effect the RERP are reflected in the plan prior to procedure issuance. This change assures reporting requirements of 50.54(q) are met.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

In addition to procedure changes made previously to expand the 50.54(q) guidance it was decided to revise procedure EPP 01-2.1 and form EP 02-1 again to require an additional review of the 50.54(q) evaluation. This supplemental review will provide a higher degree of confidence that the 50.54(q) evaluation conclusions are correct. Training will be provided on the 50.54(q) review process to appropriate personnel.

Date When Full Compliance Will Be Achieved:

Procedure EPP 02-1.1 and Form EP 02-1 will be revised and issued on November 1, 1991 to reflect the additional 50.54(q) review. The 50.54(q) training will be completed by November 15, 1991.

Exercise Weakness (482/9116-02): Failure of Shift Crews to Provide Accurate Off-site Dose Assessments Using Assets and Information Available in the Control Room

Response:

The identified weakness was a result of an underdeveloped area in the program. In past drills, guidance from EPP 01-10.1, "Protective Action Recommendations," has been used as the basis for protective action recommendations (PARs) made early in the emergency, rather than actual practice of dose assessments. An additional contributing factor to the identified weakness was the absence of joint training in the Simulator for Chemistry Technicians and Control Room crews to practice dose projections and develop communications skills. Chemistry Technicians were unfamiliar with the control room and were hesitant to disturb the Shift Supervisor.

In the future Chemistry Technicians will be trained on the Simulator with the Control Room crews. The objectives of this training will be to familiarize the Chemistry Technicians with the control room setting, acquaint them with the location of pertinent data, improve communication between Chemistry Technicians and Control Room personnel, and educate the Control Room personnel of the information the Chemistry Technicians require.

In addition, the program will be enhanced to simplify the dose assessment made prior to Technical Support Center Activation. This will be accomplished through procedure changes which establish a uniform set of questions designed to obtain necessary and preferred information from the Control Room instrumentation or Control Room personnel. The procedure will also provide guidance in the absence of information, and in the use of conservative assumptions.

The training discussed above in addition to training on procedural changes will be completed by March 31, 1992. Program enhancements and procedure changes will be completed by November 29, 1991.