



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT, NUCLEAR

November 21, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

KMLNRC 83-148

Re: Docket No. STN 50-482

Ref: 1) KMLNRC 83-129 dated 10/10/83 from
GLKoester, KG&E, to HRDenton, NRC
2) KMLNRC 83-136 dated 10/21/83 from
GLKoester, KG&E, to HRDenton, NRC

Subj: Wolf Creek Generating Station Emergency Plan

Dear Mr. Denton:

The Referenced letters 1) and 2) provided additional information concerning the Wolf Creek Generating Station Emergency Plan. Transmitted herewith are revisions to some of the information provided by the Referenced letters.

The revised information will be formally incorporated into the Wolf Creek Generating Station, Unit No. 1, Final Safety Analysis Report in Revision 12. This information is hereby incorporated into the Wolf Creek Generating Station, Unit No. 1, Operating License Application.

Yours very truly,

Glenn L. Koester

GLK:bb
Attach

cc: JHolonich (2)
WSchum/ASmith

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OATH OF AFFIRMATION

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)


I, Glenn L. Koester, of lawful age, being duly sworn upon oath, do depose, state and affirm that I am Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal, know the contents thereof, and that all statements contained therein are true.

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:



E. D. Prothro
Assistant Secretary

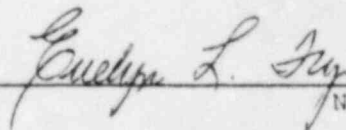
By 
Glenn L. Koester
Vice President - Nuclear

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

BE IT REMEMBERED, that on this 21st day of November, 1983, before me, Evelyn L. Fry, a Notary, personally appeared Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on behalf of and as the act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the 21st day of November, 1983, and year above written.




Notary

My Commission expires August 15, 1984

SAFETY EVALUATION REPORT RELATED TO THE OPERATIONS
OF WOLF CREEK GENERATING STATION, UNIT NO. 1
NUREG-0881
Supplement No. 2

Section 13.3.2.1

- (1) Provide all of the necessary written agreements that describe the scope of support and role within the emergency response for each relied on support organization.

Response:

With fuel load scheduled for 8/15/84, all required written agreements for support between WCGS and the support organizations will be provided to the NRC 180 days prior to loading fuel.

Section 13.3.2.2

- (1) Justification for reasonable exception to the goals for the number of additional staff personnel and the response times for their arrival. Table 2 of Supplement 1 to NUREG-0737.

Response:

See Letter KMLNRC 83-051 dated 4/29/83 from G. L. Koester, KG&E, to H. R. Denton, NRC.

The WCGS E-Plan will be revised so that the Duty Emergency Manager (DEM) position is filled at 90 minutes rather than 4 hours as currently stated.

Section 13.3.2.4

- (1) The Wolf Creek Emergency Classification System concept is being reviewed by the staff. The results of this evaluation will be reported in a later supplement.

Response:

See Letter KMLNRC 83-129 dated 10/10/83 from G. L. Koester, KG&E, to H. R. Denton, NRC.

Section 13.3.2.5

- (1) Provide a commitment to have a prompt alert and notification system, which is in accordance with the guidance of NUREG-0654, Appendix 3, installed and operational by fuel load or develop interim compensatory measures to provide emergency instructions to the public within the plume exposure EPZ.

Response:

The WCGS alert and notification system, which is in accordance with NUREG-0654, Rev. 3, will be installed and operational prior to fuel load scheduled for 8/15/84.

Section 13.3.2.7

- (1) Submit draft public information brochures for NRC and FEMA review before fuel loading and commit to distribute the brochures to the public before operation above 5% of rated power. Also, assure that public information to transients will be available within the same time period.

Response:

The public information brochures and the public information for transients (or drafts) will be submitted to the NRC and FEMA for review prior to fuel load (8/15/84). The brochures and transient information will be distributed to the public prior to WCGS operation above the 5% power level (before the full-scale exercise).

- (2) Provide a more detailed description of the arrangements made to establish a Media Information Facility and to accommodate media personnel.

Response:

KG&E's Media Release Center (MRC) for WCGS is located in a former school building located in New Strawn, Kansas, approximately 3.5 miles northwest of the site and less than one mile from the Emergency Operations Facility (EOF). The building will accommodate several hundred media representatives in the gymnasium while classrooms surrounding the gymnasium provide privacy for telephone conversations.

The MRC may be activated for an Alert, but will be activated for Site Area Emergencies and General Emergencies. The Coffey County Public Information Officer (PIO) activates the MRC. The Coffey County PIO reports to the MRC for Site Area Emergencies or General Emergencies. The State of Kansas PIO reports to the MRC after a State of Disaster Emergency is declared by the Governor. Nondedicated telephone lines allow contact between the MRC and the EOF. Because of the proximity of the EOF and MRC, face-to-face conversations are practical if appropriate or required. The MRC will have public information status boards, telecopier capabilities, typewriters, appropriate office supplies, photocopy capabilities and outside telephone lines for use by the media.

Section 13.3.2.8

- (1) Provide a commitment that the permanent emergency response facilities and equipment will be operational prior to fuel loading or that adequate interim facilities and capabilities will be in place.

Response:

WCGS permanent emergency response facilities and equipment or interim facilities and capabilities will be operational prior to fuel load (8/15/84).

- (2) Describe the provisions made to obtain information from the National Weather Service on meteorological conditions for the region in which the WCGS is located.

Response:

KG&E will have an arrangement in place with a "first order station" of the National Weather Service by June, 1984.

Section 13.3.2.9

- (1) Provide the technical bases and supporting information for the primary and backup dose calculation methods. Revise the emergency plan and develop emergency plan implementing procedures to reflect the dose assessment methodology.

Response:

Telephone communications (on 10/18/83) between KG&E and the NRC reviewer (P. Robinson) identified information

in the reviewer's possession addressing this subject. The dose assessment methodology section of the emergency plan will be expanded in the next revision, and an implementing procedure will be developed to reflect dose assessment methodology.

Section 13.3.2.10

- (1) Develop predetermined protective action recommendations in accordance with the guidance of Appendix 1 to NUREG-0654 and incorporate these recommendations into the emergency plan and a specific procedure.

Response:

Predetermined protective action recommendations keyed to each of the four classes will be developed and will take into account both the guidance of Appendix 1 to NUREG-0654 and the WCGS emergency classification scheme. These recommendations will be incorporated into the emergency plan and an implementing procedure.

The emergency classification scheme has been discussed with the state and local governmental authorities and the classification scheme appears in both of their emergency plans. These plans are annually revised by each entity and any changes made to the emergency classification scheme by the licensee are reviewed with the state and local government authorities.

As part of the emergency classification scheme, the pre-determined action recommendations described above will be discussed with the state and local government authorities and the mutually agreed upon recommendations will be incorporated into the WCGS E-Plan. The agreed upon pre-determined protective action recommendations will then be considered for incorporation into the state and local government's emergency plans.

- (2) Coordinate planning efforts with offsite authorities to ensure the administrative and physical means will exist to alert and provide prompt instructions to the public within the plume exposure pathway EPZ.

Response:

KG&E is required to notify offsite authorities (Coffey County and the State of Kansas) within 15 minutes post-classification of an event as an Alert, Site Area Emergency or General Emergency. The primary means of notification is the telephone with a radio system

backup. Both the County and the State maintain 24-hour-per-day notification capabilities.

The Coffey County notification point of contact is the Sheriff's Office Dispatcher, who is responsible for notifying appropriate County officials including the Sheriff, Chairman of the Coffey County Commissioners, and the County Public Information Officer (PIO).

The Chairman of the Coffey County Commissioners is responsible for making the decision to activate the alert and notification system and/or provide protective action recommendations. Emergency authority, as stated in Section 1.3 of the Coffey County Contingency Plan for Incidents Involving Commercial Nuclear Power, is given in the following line of succession:

1. Chairman of the County Commissioners.
2. County Commissioners other than the Chairman in order of seniority by tenure in descending order. In case of identical tenure, the Commissioner representing the district with the lowest district number will take precedence (i.e., 1st district, 2nd district).
3. County Sheriff.
4. County Clerk (County PIO).
5. Emergency Preparedness Coordinator.

The Chairman discusses what protective actions would be appropriate with the above mentioned personnel as well as the County Engineer, Health and Medical Management Team Leader, Radiological Defense Officer and the Kansas Division of Emergency Preparedness, as available. Offsite monitoring results and information received from the licensee are used for this assessment. When a protective action is decided upon, the County PIO notifies the EBS entry station and coordinates the activation of the tone alert radios with the activation of the sirens by the County Sheriff. The County PIO informs the EBS entry station which pre-written announcement to broadcast.

In the situation when time does not permit the County Sheriff to contact the Chairman and other members of the County Emergency Response Organization due to event escalation, or if he is unable to contact any of the Commissioners, the County Sheriff has the authority to make protective action decisions based on recommendations by KG&E. The County Sheriff then directs his Dispatcher to contact the EBS entry station with the appropriate information.

Those personnel who have protective action decision-making responsibility receive the appropriate training in the Joint Training Program.

Q.I.c The emergency plan and procedures should be revised to reflect the ability to classify emergencies that are not directly related to plant malfunctions (e.g., insurgents gaining access to vital areas).

R.I.c The Wolf Creek Generating Station (WCGS) model initially classifies events not related to plant malfunctions (ie., fires, security threats, natural phenomenon) as unusual events through use of Table 2.2-2. Further evaluation of these occurrences as to barrier challenge is performed as part of the model's Phase 2. If, in the course of this evaluation, a barrier(s) is placed in jeopardy, reclassification of the event will occur according to the methodology of Phase 2.

Central to the WCGS model is its mechanistic approach to barrier challenge. Compliance with previous NRC guidance in fire, security and other areas precludes their immediate challenge to the barriers such that an evaluation of the threat and re-classification under Phase 2 is possible. An illustrative example is as follows: Vital areas within the plant have been identified and strict security measures enacted to prevent insurgents from gaining access to locations where barrier challenge may be affected. This is part of the WCGS Security Plan which has been reviewed and accepted by the staff. Aside from demonstrating compliance with the staff's security requirements, the existence of these precautions removes the mechanistic means of direct insurgent challenge to the barriers. Should such a challenge occur, it will represent a situation similar to those of plant malfunctions requiring analysis under Phase 2 of the model. Similar relationships exist between fire threats and those preventative measures which are enacted as part of the WCGS Fire Plan for compliance with the staff's fire regulations.

As a result of this logic, separate treatment of events which are not directly related to plant malfunctions need only be performed during their preliminary classification, after which they enter into the model's jurisdiction, and are handled similar to all other events.

The Wolf Creek Generating Station Emergency Plan will be revised to read as follows:

"Section 2.4.3.3 Fire, Security, Adverse Weather Challenges.

Challenges to barrier integrity such as fire or adverse weather are addressed by the WCGS classification model in a similar manner. Initially, upon recognition, these events are classified as Unusual Events.

R.I.c (Cont'd)

Further evaluation entailing visual inspections, fire sensor data, security alarms, etc. determine the potential impact of each upon the fission product barriers. Event reclassification is made in those cases where the barriers are affected.

As an illustrative example, a fire present in the turbine building remains as an Unusual Event since the barriers are not effected. This is compared to the situation where a similiar fire occurs at the containment personnel hatch. Under these circumstances, the barrier of containment has been severely challenged (or lost) and a reclassification to an Alert is made."

Challenges to fission product barrier integrity due to security intrusions are also addressed by the classification model.

Upon receipt of notification that a security intrusion has occurred, the Shift Supervisor classifies the event based, in his judgement, on the severity of the security intrusion challenge of a fission product barrier. In classifying the event, the Shift Supervisor will consider the magnitude and extent of the intrusion into the plant (i.e., proximity to fission product barriers) and the potential challenge to a fission product barrier. At a minimum, an intrusion is classified as an Unusual Event.

NOTE: The above described concepts will be incorporated into the emergency plan implementing procedures and the training program.