

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

January 6, 1992

WM 92-0002

R. D. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Reference: Letter dated December 9, 1991 from R. D. Martin, NRC,
to B. D. Withers, WCNOC
Subject: Docket No. 50-482: Response to Systematic Assessment
of License Performance Report

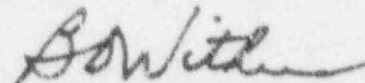
Dear Mr. Martin:

The purpose of this letter is to provide Wolf Creek Nuclear Operating Corporation's (WCNOC) response to the Reference. As identified in the Reference, WCNOC is required to provide planned corrective actions to achieve improved performance in the Safety Assessment/Quality Verification functional area.

The Attachment to this letter provides the actions being taken by WCNOC to improve performance in the Safety Assessment/Quality Verification functional area. WCNOC is implementing a Corporate Performance Improvement Plan (PIP) which was briefly discussed in meetings on December 6, 1991 and December 18, 1991. The Attachment discusses two of the issues to be addressed by the PIP. It is WCNOC's intent to further discuss the issues to be addressed and the implementation of the PIP with you in February 1992.

If you have any questions concerning this matter, please contact me or Mr. S. G. Wideman of my staff.

Very truly yours,



Bart D. Withers
President and
Chief Executive Officer

BDW/aem

Attachment

cc: A. T. Howell (NRC), w/a
G. A. Pick (NRC), w/a
W. D. Reckley (NRC), w/a
Document Control Desk (NRC), w/a

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Response to Systematic Assessment of License Performance

The Systematic Assessment of Licensee Performance (SALP) Report noted weaknesses in assessing operability concerns; responding to NRC findings; documenting problem areas; effectively resolving previously identified programmatic weaknesses; and establishing and communicating management's expectations to the plant staff with regard to problem identification and correction. The report indicated that these weaknesses are indicative of insufficient management involvement in and oversight of the self-assessment and corrective action programs. Wolf Creek Nuclear Operating Corporation's (WCNOC) response addresses four major areas that encompass the weaknesses identified in the report. The four major areas consist of Management Oversight, Corrective Action, Self-Assessment and Operability/Reportability Determinations.

Management Oversight

On December 11, 1991, the President and Chief Executive Officer held a meeting with department heads, managers and supervisors to reiterate executive management's expectations concerning the corrective action process and oversight of plant activities and programs. On December 16, 1991, the Director Plant Operations issued a letter to the Operations Department Managers to convey operational philosophy and management expectations. Through these efforts WCNOC management has expressed its expectations on corrective actions and management oversight of plant activities as well as programs. Training will be provided to managers and supervisors on the methods and techniques for conducting performance-based observations to be utilized in the implementation of management oversight.

WCNOC is developing an issue management program to effectively resolve significant issues that are identified from operational events, regulatory issues or industry events. The program will require identification of issues, assignment of a responsible manager, development of a plan and schedule for resolution of the issue, approval of the plan and schedule by the Issue Management Group and implementation of actions. This program will be directed by the Issue Management Group, which consists of the WCNOC nuclear department heads (Director Plant Operations, Director Quality and Safety, Director Nuclear Services and Director Nuclear Plant Engineering). The chairman of the Issue Management Group is the Director Plant Operations. The first meeting of the Issue Management Group was conducted to develop a charter for the program. This program will be implemented by January 31, 1992.

WCNOC is developing a formalized management monitoring program. This program will include periodic unscheduled performance-based observations of ongoing plant activities by management. The monitoring program will provide management overview of various aspects of WCGS activities. The management monitoring program will be implemented by February 21, 1992.

Corrective Action

WCNOC is continuing to enhance the corrective action program. These enhancements have included a centralized tracking system and a review of corrective action documents (Programmatic Deficiency Reports) for impact on other areas or organizations. In August 1991, a change was made to the corrective action program which revised the Programmatic Deficiency Report to the Performance Improvement Request (PIR). The intent of this change was to eliminate the confusion surrounding the definition of "programmatic conditions adverse to quality" and expand the scope of the program to include any condition that could adversely effect plant performance or work activities. To provide an increased understanding of the corrective action program, training will be provided to various levels of the technical staff by July 1, 1992. Additional training on root cause evaluations will be completed by April 30, 1992.

Executive management is periodically reviewing selected PIRs to monitor their use to determine if additional enhancements to the corrective action program are necessary. Additionally, executive management attends the monthly Quality Assurance audit exit meetings to understand the findings first hand.

Self-Assessment

In September 1991, WCNOC initiated a review of Quality Assurance Audits and Surveillances, Licensee Event Reports, NRC inspection reports and INPO assessments to categorize the findings identified in these documents. Nine performance and program implementation issues were identified and formed the initial basis for the Corporate Performance Improvement Plan (PIP). The PIP will address significant performance and program issues at WCGS. The PIP process entails the identification of a PIP issue, assignment of a PIP Project Manager, development of a plan and schedule with executive management approval, implementation of the plan and a measurement of the effectiveness of the actions taken. Implementation of the PIP process will be completed by February 21, 1992. Two of the initial PIP issues to be addressed are management effectiveness and the corrective action process.

Functional self-assessment is an integral part of the line managers responsibilities. A procedure will be developed and implemented for controlling line organization self-assessments by March 31, 1992. This procedure will ensure that line management effectively uses the self-assessment process to monitor performance. A standard distribution for self-assessment reports will ensure executive management and department head awareness of significant and resources required for corrective action. Additionally, this procedure will require the initiation of Performance Improvement Requests (PIRs) in accordance with KGP-1210, "Performance Improvement Requests" when self-assessments identify conditions adverse to performance.

The Quality Assurance organizations will perform a verification that nuclear related activities have adequate oversight responsibilities assigned. This review will be completed by June 1, 1992.

Operability/Reportability Determinations

The SALP report identified several examples where operability determinations were considered inadequate or untimely. WCNOG will perform a review of the operability determination process. The guidance provided in Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability" will be considered in this review. Enhancements to existing procedural controls or additional procedures as appropriate will be completed by March 31, 1992.

Procedure ADM 02-033, "Instructions Describing Reportability, Review and Documentation of Licensee Event Report (LERs), and Defect Deficiencies" was revised in April 1991 to provide more definitive guidance on timeliness of reportability evaluations. This procedure was revised again in May 1991 and changed the Defect/Deficiency Report to the current Reportability Evaluation Request (RER) format. Additionally, a status tracking system for RERs was implemented with periodic reports to management. The details of the specific changes were provided to the NRC in letter NO 91-0212 dated August 1, 1991.