

WOLF CREEK

NUCLEAR OPERATING CORPORATION

January 5, 1993

Bart D. Withers
President and
Chief Executive Officer

WM 93-0001

J. L. Milhoan, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Reference: Letter dated December 4, 1992 from J. L. Milhoan,
NRC, to B. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Systematic Assessment
of Licensee Performance Report

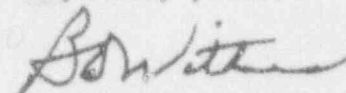
Dear Mr. Milhoan:

Provided as an attachment to this letter is Wolf Creek Nuclear Operating Corporation's (WCNOG) response to the Reference, which transmitted the initial Systematic Assessment of Licensee Performance (SALP) report for Wolf Creek Generating Station (WCGS). WCNOG is required to provide corrective actions to achieve improved performance in the Safety Assessment/Quality Verification functional area.

The Attachment to this letter provides the actions currently being taken or planned by WCNOG to improve performance in the Safety Assessment/Quality Verification functional area. As discussed at the Region IV office during an October 23, 1992 meeting, WCNOG is implementing the Performance Enhancement Program (PEP). The Attachment discusses several of the PEP Action Plans which were developed to improve WCNOG's performance in the areas of Self Assessment and Quality Verification.

If you have any questions concerning this matter, please contact me at (316) 364-8831 extension 4000 or Mr. Kevin J. Moles at extension 4565.

Very truly yours,



Bart D. Withers
President and
Chief Executive Officer

BDW/jan

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 NRC Systematic Assessment of Licensee Performance (SALP)

Reference: NRC Letter dated 12/04/92 from J. L. Milhoan, NRC, to B. D. Withers, WCNOC. Wolf Creek Generating Station (WCGS) SALP Evaluation Period: 10/06/91 through 10/11/92.

Section G, "Safety Assessment/Quality Verification" (SA/QV), of the Reference noted weaknesses in the areas of self-assessment and corrective action. Although self-assessment was noted to have improved during the SALP period, significant programmatic problems including motor-operated valve program weaknesses near the beginning of the SALP period contributed to a significant breakdown to the self-assessment process within WCNOC. In the area of corrective action several examples of less than adequate or untimely corrective actions were identified. Untimely actions to resolve long-standing essential service water system water hammer events and a failure to replace a defective flow transmitter following a surveillance were cited within the SALP report. The NRC also noted that actions to correct procedural noncompliance, inadequate procedures, and inattention to detail were not fully successful.

WCNOC's response addresses enhancements/improvements to the (I) Corrective Action Program, (II) Self-Assessment Program, (III) Quality Assurance program, and (IV) Industry Technical Information Program (ITIP).

I. CORRECTIVE ACTION PROGRAM:

In the previous SALP report, WCNOC was noted to be weak in the area of corrective action. In response to the previous SALP report WCNOC expanded the scope of the corrective action program to include any condition that could adversely effect plant performance or work activities. This was accomplished, in part, by revising the Programmatic Deficiency Report to the Performance Improvement Request (PIR). WCNOC also committed to train various levels of technical staff on the corrective action program and root cause evaluations. Approximately 850 plant personnel completed training on the revised corrective action program and the new PIR process. Also, 142 plant personnel completed a 3 day root cause evaluation techniques course and 37 Managers attended a 1 day root cause course.

Performance Enhancement Program (PEP) Action Plan 3.4.5 has been developed, in part, to further improve the effectiveness of WCNOC activities performed to identify, evaluate, and remedy non-hardware problems, and prevent them from recurring. Although the PEP was initiated during the SALP period, significant improvements to WCNOC performance were not anticipated to occur by the end of the SALP period. Instead, gradual, progressive change is being promoted. The objectives of this action plan are to create an environment where identifying and correcting problems is seen as good and productive, to ensure personnel understand when corrective actions are necessary and sufficient, to verify that completed actions resolve the problem, to ensure an environment where problems are reported and corrected without hindrance, and to consolidate existing non-hardware corrective action programs to eliminate redundancies and simplify the process. Essential to these objectives is changing WCNOC culture and climate.

Through this process of positive change WCNOG will better ensure problems are properly self-identified, initiate immediate remedial actions, determine the cause, extent, preventive actions and significance of the problem, implement appropriate and thorough actions, and ensure effectiveness follow-up and verifications are appropriate. WCNOG anticipates this change in culture to become evident throughout 1993 and 1994.

Several actions have been initiated to monitor and focus the change process and to assist acceptance of the corrective action changes by plant personnel. A Performance Improvement Request (PIR) review group has been established to monitor the PIR process and provide input on timeliness and ongoing corrective actions. The Quality Assurance semi-annual corrective action audit also measures the effectiveness of the changes to the corrective action program. These audits have provided feedback concerning the progress these changes are making as well as areas for improvement where greater management attention is required. It was recognized through these audits, and NRC inspection activities, that some plant personnel have shown a reluctance to change. Management's expectations have been made clear on the need for change.

II. Self-Assessment Program

It was noted in the previous WCGS SALP report that areas of weakness were apparent with WCNOG's self-assessment program. WCNOG management understands the need for acceptable self-assessment capabilities and the need for improvement in this area. It has been observed by management that all WCNOG organizations have not fully embraced the benefits of and/or necessity for fully effective self-assessment techniques. It is also realized that attention must be focused on declining performance trends such as timeliness and attention to resolution of problems. Procedural guidance has been developed to aid WCNOG in self-assessment, but it has been determined that these procedures are currently too broad in scope to be fully effective. It was also determined that cultural attitudes are less than desired for management's expectations to be fully effective regarding the usefulness of the self-assessment program. Several actions have been initiated to enhance this performance. These improvements include raising management's awareness of significant issues, establishing investigation teams for significant events, developing long-term objectives for self-checking techniques, and following goals set by PEP.

In response to the previous SALP report, specifically addressing self-assessment weaknesses, WCNOG committed to develop a company-wide procedure for self-assessment. On March 30, 1992, KGP-1205, "Self Assessment Process", was issued. KGP-1205 provides some guidance towards evaluating overall effectiveness, efficiency, and technical adequacy of organizational and program performance. The initiation of this procedure was intended to allow

organizations to better understand what weaknesses are evident prior to a significant problem arising. These problems could then be directed to management's attention. The Issues Review Group (IRG) was also developed to ensure appropriate management oversight is given to more significant industry and WCGS events. Through the IRG a designated lead person is selected to take direct responsibility of identified problems or areas requiring action.

Another enhancement to the self-assessment program was initiated during the SALP period. This was to initiate an investigation team upon discovery of potentially significant events or other events of generic interest/concern. The purpose of these teams is to determine root cause and contributing factors of the event, and establish corrective actions. Recent examples of the use of these teams are the spent fuel pool drain down event, the containment "noise" event, and essential service water system low flow event. The advantages of utilizing an investigation team are that a multi-disciplinary group of individuals is being utilized, it allows personnel to get involved with plant events, and it provides good management oversight and guidance into the investigation. The use of investigation teams will continue in the future.

PEP Action Plan 3.2.1, "Self-Assessment", has been developed to promote ownership and accountability for the resolution of issues, which is expected to result in potentially significant cost savings and create safer, more efficient plant operation and organizational performance. This PEP Action Plan defines WCNOG management expectations, and will establish trending, assessment criteria, and practices to be used during self-assessment. Meeting these specific goals will not only provide a uniform method for improving WCNOG performance, but it will also provide management feedback on progress in self-assessment capabilities. Several specific goals of PEP Action Plan 3.2.1 are to create a WCNOG self-assessment policy, to revise and enhance upon the guidance in KGP-1205, provide guidelines for investigation teams, further define self-checking techniques, initiate a self-SALP program, and establish self-organizational evaluation processes.

III. Quality Assurance Improvements:

Improvements in the SA/QV SALP functional area are also being implemented through enhancements to the Quality Assurance program. To identify where improvements could be made to the Quality group and where areas of weakness are evident, WCNOG has compiled pertinent information from outside and within the company. Through the recent PEP survey, using ATLAS, INPO assistance visits, NRC inspection activities, and Haliburton NUS Corporation, it has been concluded that the WCNOG Quality Assurance group has not been effectively utilized. Goals have been developed to make Quality Program and group improvements. As discussed below several of these goals involve more effective communication, the expanded use of technical experts, enhancing the Audit and Surveillance processes, and increasing the general level of solicitation of QA by other groups in resolving concerns.

Effective communication is essential between the Quality Assurance group and evaluated organizations. This communication involves not only face-to-face speaking and listening skills, but also interfacing with the different quality verification groups. In an effort to better improve communications skills within the Quality Assurance group, communication skills training has been provided for their members. Also, Quality Assurance has representatives in the Management Action Plan (MAP), PEP, Issues Review Group (IRG), Performance Improvement Request (PIR) review group, and the Inspection Report Review Group (IRRG). The Quality Assurance group is initiating better feedback mechanisms. These include meetings and personal interviews to obtain feedback from the evaluated groups. To obtain this feedback an effectiveness form is being developed. The purpose of this form is to collect information from evaluated groups to grade the effectiveness of the evaluation and of the auditors themselves. WCNOC is confident that these efforts will increase Quality Assurance communications skills and awareness, as well as more effectively utilize QA skills throughout WCNOC.

It is realized that, although the Quality Assurance group consists of a wide variety of knowledgeable staff, there are situations where greater technical expertise is required. The Quality Assurance group has previously utilized technical experts from other Region IV utilities in assisting WCNOC auditors. This practice has met with considerable success as was demonstrated in the areas of Security, Emergency Preparedness, Health Physics, and Radiological Environmental Monitoring. Not only will other utilities be utilized to provide technical experts, but WCNOC personnel outside of the audit group are also being utilized for their technical expertise. This assistance will be accomplished through, for example, a member of the Operations group being assigned to the Quality Assurance group for a period of time.

Also, personnel outside of Quality Assurance will participate in audits. This approach not only provides the Quality group greater knowledge during evaluations, but it allows those participating to better understand their jobs from a different perspective. Quality Assurance also provides assistance in performing self-assessment for other groups within WCNOC. Quality Assurance personnel have previously been "loaned" to other departments to assist in self-assessment. Quality Assurance will continue to make themselves available for these self-assessments.

Significant programmatic enhancements are also being made in the Quality Assurance area. Recommendations have identified the need for these changes, which include eliminating specific descriptive corrective actions in audit/surveillance reports, and QA utilizing PIRs to document findings, thereby eliminating the use of Quality Program Violations (QPV) and Quality Program Deviations (QPL). This consolidates corrective action vehicles and reduces redundancy. One other recent improvement was the change in format to QA audit exits. Near the beginning of the SALP period Quality Assurance exit

meetings were consolidated. One exit meeting is held for all audits conducted during the month. This practice allows greater management attention by providing less difficult exit attendance schedules. Another change has been to the meeting formats to include the results of monthly Quality surveillances. A short summary of Surveillance results is usually provided during the monthly exit meetings which has increased management and personnel awareness, and the effectiveness and resolution of issues.

IV. Industry Technical Information Program:

In the Reference the NRC stated that "several weaknesses were identified in the area of review adequacy and timeliness of actions taken to resolve industry concerns." Industry operating experiences are assessed by the Industry technical Information Program (ITIP). In February 1992, the ITIP was transferred to Nuclear Safety Engineering. Several enhancements to the ITIP, including programmatic improvements, procedural changes, and development of group goals, are fully expected to further improve performance in this important area.

The ITIP coordinator is responsible for oversight of the ITIP process, initial ITIP reviews, assignment of responsibility, and reviews for adequacy of evaluations and actions taken. Other programmatic changes include shortening the initial response date for assigned organizations to 45 days, and requiring requests for extensions in due dates for activity/evaluation completion to be escalated to higher management levels for review and approval.

Procedure KGP-1311, "Industry Technical Information Program", has undergone major revisions to enhance user understanding of the ITIP process and to identify the appropriate interfaces. This procedure provides for periodic program effectiveness reviews in accordance with INPO 89-005, "Guidelines for Use of Operating Experience". These reviews monitor and evaluate program success in attaining pertinent objectives, such as to prevent similar industry events at WCGS, ensure all relevant issues are addressed, and make recommendations for improvements to the program.

Having established ITIP goals should also continue to increase the overall program effectiveness. Several of these goals include a current effort to review the 50 oldest ITIPs (which are greater than 18 months old) for potential safety significance and plant reliability impact, an effort to reduce the number of open INPO Significant Operating Experience Reports (SOER) recommendations, and the establishment of overdue limits and initial ITIP review timeframes. Some of the benefits of these changes can already be seen. One example is the reduction of average overdue ITIPs from 30.8 in 1989 to 7.8 in 1992.

Conclusions:

It should be understood that the improvements being made to these areas are dynamic in nature and will likely evolve with time and experience. As discussed between WCNOC and the NRC, quarterly status meetings on PEP are planned and the Resident Inspectors will be informed of PEP activities on a routine basis as required. Several concerns were identified on the cover letter and within the text of the Reference that workers are reluctant to initiate PIRs and corrective actions are not timely. The status of actions addressing these specific areas will be discussed in the first 1993 quarterly status meeting.

WCNOC personnel from the working level through Senior Management have: (1) utilized the Corrective Action Program (CAP) process/PIRs to a much larger extent; (2) determined the overall CAP process will continue to be enhanced and simplified as appropriate; (3) recognized that timely and effective utilization of self-assessment techniques are a cornerstone to continued self-recognition and resolution of problems; (4) implemented various improvements to the QA program/process and the group that will continue to embrace overall organizational performance betterments; and (5) changed the ITIP process to focus on timely completion of reviews and proper trending techniques. WCNOC is committed to continued improvements in the SA/QV SALP functional area. Our goal is to achieve excellence and superior levels of performance in SA/QV. As noted by the NRC during the December 16, 1992, NRC/WCNOC SALP Public Meeting, "recognition" is the first big step towards effective change. The many SA/QV programs already put in place at WCGS and the PEP efforts underway, are fully expected to move WCNOC performance towards the "best in class".