

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Neil S. "Buzz" Carns
Chairman, President and
Chief Executive Officer

September 26, 1996

WM 96-0104

U. S. Nuclear Regulatory Commission
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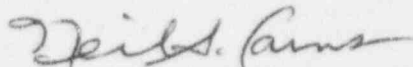
Reference: Letter dated August 30, 1996, from K. E.
Brockman, NRC, to N. S. Carns, WCNOG
Subject: Docket No 50-482: Response to Exercise Weakness
50-482/9613-01

Gentlemen:

This letter transmits Wolf Creek Nuclear Operating Corporation's (WCNOG) response to Exercise Weakness 50-482/9613-01. This exercise weakness identified that an operating crew failed to correctly formulate protective action recommendations during the walkthrough of a simulator scenario.

WCNOG's response to this exercise weakness is in the attachment. If you have any questions regarding this response, please contact me at (316) 364-8831, extension 4100, or Mr. Terry S. Morrill at extension 8707.

Very truly yours,



Neil S. Carns

NSC/jad

Attachment

cc: L. J. Callan (NRC), w/a
W. D. Johnson (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

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Reply to Exercise Weakness 50-482/9613-01

Exercise Weakness 50-482/9613-01: Failure to correctly formulate protective action recommendations.

". . . Note B on the protective action recommendation flow chart from Emergency Plan Procedure EPP 01-10.1, 'Protective Action Recommendations,' Revision 11, was misinterpreted. As a result, a recommendation to evacuate John Redmond Reservoir was not made. . . . The failure to correctly formulate protective action recommendations was identified as an exercise weakness (482/9613-01)."

Admission of Exercise Weakness:

Wolf Creek Nuclear Operating Corporation (WCNOC) acknowledges and agrees that an exercise weakness of failing to correctly formulate protective action recommendations occurred during an Emergency Preparedness simulator exercise, contrary to EPP 01-10.1, "Protective Action Recommendations," Revision 11.

Reason for Weakness:

Two discrepancies were identified in this inspection report. First, dose rate values were used instead of actual dose values in the formulation of Protective Action Recommendations (PAKs). The root cause of this discrepancy is that the Emergency Dose Calculation Program Release Rate form is not "user friendly" and the information presentation is deficient. The second discrepancy was that Note B on the "Protective Action Recommendation Chart," Attachment A of EPP 01-10.1, was misinterpreted as stating that a release was not in progress. Note B stated, "If plant conditions preclude the possibility of a release, it is not necessary to recommend evacuation of John Redmond Reservoir (JRR). Otherwise, JRR is recommended for evacuation as a precautionary measure upon declaration of a Site Area Emergency." The exercise scenario did eventually produce a release. The root cause of this discrepancy is personnel error in that Note B was misinterpreted by the Shift Supervisor.

Corrective Steps Taken and Results Achieved:

On July 26, 1996, electronic mail was issued to all Shift Supervisors, Supervising Operators, and Shift Engineers clarifying the purpose of Note B, and stating that the expectation remains "to recommend evacuation of John Redmond Reservoir" unless plant conditions preclude the possibility of radiological release. The Shift Supervisor involved in this event was included on the electronic distribution.

On September 13, 1996, a Duty Emergency Director and Duty Emergency Manager meeting was held and the same clarification was addressed.

On September 13, 1996, the Manager Emergency Planning reinforced counseling to the Shift Supervisor involved in this event.

On September 16, 1996, the Emergency Dose Calculation Program Release Rate form was revised to bold print the section titles and the title for the dose values required for the Protective Action Recommendations. Distinct separations were also inserted between sections.

On September 16, 1996, as an enhancement to improve human factors, the "Protective Action Recommendation Chart," Attachment A of EPP 01-10.1 was revised. Note B was designated as Note A and revised to emphasize considering evacuation of John Redmond Reservoir first, and then consider evaluating conditions that would preclude a release and warrant not recommending evacuation.

Date When Full Compliance Will Be Achieved:

Full compliance with the above noted requirements has been achieved.