

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 50-482
License No.: NPF-42
Report No.: 50-482/96-25
Licensee: Wolf Creek Nuclear Operating Corporation
Facility: Wolf Creek Generating Station
Location: 1550 Oxen Lane, NE
Burlington, Kansas
Dates: December 9-13, 1996
Inspector: Thomas H. Andrews Jr., Radiation Specialist
Approved By: Blaine Murray, Chief, Plant Support Branch
Division of Reactor Safety

Attachment 1: Supplemental Information

EXECUTIVE SUMMARY

Wolf Creek Generating Station
NRC Inspection Report 50-482/96-25

Plant Support

- The licensee maintained detailed instructions and operating procedures, copies of licenses, and current regulations related to the transportation of radioactive waste and materials (Section R1.1).
- The licensee provided multiple, high-quality training sessions to personnel within the health physics organization. Participation in training activities was very good. Knowledge and understanding of the materials provided were good (Section R5.1).
- Licensee self assessments were very good and provided probing insight into program performance. However, problems associated with corrective actions reduced the benefit gained from these assessments (Section R7.1).

Report Details

Summary of Plant Status

The plant operated at 100 percent power during the inspection period.

III Engineering

E2 Engineering Support of Facilities and Equipment

A recent discovery of a licensee operating their facility in a manner contrary to the Updated Final Safety Analysis Report (UFSAR) description highlighted the need for a special focused review that compares plant practices, procedures, and/or parameters to the UFSAR description. While performing the inspection discussed in this report, the inspector reviewed the applicable portions of the UFSAR that related to the areas inspected. The inspector verified that the UFSAR wording was consistent with the observed plant practices, procedures, and/or parameters.

IV. Plant Support

R1 Radiological Protection and Chemistry Controls

R1.1 Implementation of the Solid Radioactive Waste Program (86750)

a. Inspection Scope:

The inspector reviewed the licensee's files to determine if they have up-to-date copies of Department of Transportation, NRC, and agreement state regulations. The inspector reviewed licensee records associated with shipments. The inspector reviewed procedures used to prepare shipments of radioactive waste.

b. Observations and Findings:

The licensee maintained up-to-date copies of applicable regulations associated with the transportation of radioactive waste and materials. The licensee had current copies of licenses for facilities receiving shipments of radioactive waste and materials.

The licensee had implemented detailed instructions and operating procedures for personnel involved in the transfer, packaging, and transport of low-level radioactive waste. Individuals authorized to certify low level radioactive waste shipments in accordance with Section II of Appendix F to 10 CFR 20 were specified by title in procedures.

The inspector reviewed selected shipping documentation packages to ensure compliance with procedures and regulations. The licensee used a computer

program to generate the shipping documents. This program automatically applied the appropriate A_1 and A_2 values for the isotopes identified to determine the shipping classification.

The inspector reviewed selected A_1 and A_2 values contained in the computer database and determined that they were correct. The inspector reviewed the licensee's process for listing isotopes and determined that the "95 percent rule" contained in 49 CFR 173.433 was properly implemented.

c. Conclusion:

The licensee maintained detailed instructions and operating procedures, copies of licenses, and current regulations related to the transportation of radioactive waste and materials.

R5 Staff Training and Qualification

R5.1 Training (TI 2515/133)

a. Inspection Scope:

The inspector reviewed the training provided to radwaste personnel and to health physics technicians associated with the revised Department of Transportation and NRC regulations.

b. Observations and Findings:

The licensee provided several different training courses to personnel who performed activities associated with the radwaste program. The training included detailed training on the new transportation regulations from two different vendors. Personnel who had direct involvement in shipping activities participated in this detailed training.

Task-specific training was provided to health physics technicians and to decontamination personnel. The lesson plans for these courses showed that new information resulting from regulatory changes was provided. The inspector noted that all of the technicians and decontamination personnel had documented training records showing participation in at least one of the courses offered. There was a large number of individuals who participated in multiple courses. The inspector discussed the new regulations with health physics technicians and determined that they were knowledgeable regarding the labels used on different materials and the risk involved with each.

c. Conclusion:

The licensee provided numerous, high-quality training sessions to personnel within the health physics organization. Participation was very good. Knowledge and understanding of the materials provided were good.

R7 Quality Assurance in Radiological Protection and Chemistry Activities

R7.1 Audits & Assessments (86750)

a. Inspection Scope:

The inspector reviewed self assessments performed by the licensee related to solid radioactive waste and radioactive material activities. The inspector also reviewed corrective action documents generated as a result of these assessments

b. Observations and Findings:

The assessments reviewed consisted of quality assurance surveillances and self assessments. These assessments of the radwaste program were very good. They provided good, probing insight into program performance. The inspector interviewed personnel associated with performance of the assessments and surveillances and determined that they were very knowledgeable with regard to the activities in this area.

The inspector observed that there were typically good findings identified in the assessments. However, review of the followup corrective action documents identified areas where the benefits gained from the assessments were not being applied to the fullest extent possible.

In Self Assessment Report SEL 95-046, "Radiological Waste Operations," the licensee identified a possible trend involving improper valve alignment. The assessment identified eight possible performance improvement requests generated between October 1994 and October 1995 that appeared to support this trend. The licensee generated a performance improvement request to document this observation to initiate a review of the identified incidents. The licensee specifically evaluated the eight incidents identified and determined that two were incorrectly classified as improper valve alignments. The other six were attributed to procedural problems or personnel errors. The licensee subsequently determined that there was no adverse trend associated with improper valve alignment.

The inspector reviewed an abbreviated listing of performance improvement requests generated associated with the radwaste program. During this review, the inspector observed five incidents that have occurred since the assessment that appear to be similar to those identified in the assessment. Of special note, three of the incidents happened within a month of the closeout of the performance improvement request associated with the review of the potential trend.

The inspector observed that the scope of performance improvement requests generated as a result of assessment findings typically were very specific. This caused the actions taken to address the performance improvement requests to be specifically attuned to the problem. As a result, additional followup to determine the extent of the problem or possible generic nature of the problem was not performed.

As an example, in Self Assessment SEL 96-021, "Health Physics Technician Training Program," the licensee identified a "cheat sheet" located at a counting station. This unofficial aid was used by licensee personnel because it was "easier to use than the procedure." The licensee's corrective action was to remove the "cheat sheet." A comment in the performance improvement request stated, "We need to see if there are any other cheat sheets or aids which should be incorporated into the procedures." There was no documentation available to indicate that this action was taken.

The inspector observed instances where programmatic issues were identified but no corrective actions were taken. As an example, Self Assessment SEL 96-021 contained the following statement:

Through conversations with technicians, a reluctance to submit procedure or qual card enhancements was prevalent. Some of the reasons for this included; I don't have the time, they don't ever get implemented so I just stopped doing it, and the lead tech understands it so he feels everyone else ought to.

In this case, no action was taken by the licensee to investigate this observation. A performance improvement request was not initiated and no review was performed to substantiate or disprove the observation. When asked, the licensee indicated that this was considered to be a program enhancement and no action was needed. Of note, this statement was in the same paragraph discussing the discovery of the "cheat sheet," and appeared to provide possible reasons for use of the cheat sheet instead of revising the procedure.

In each of the cases observed, the inspector looked for any remedial assessments performed by the licensee. These assessments would evaluate corrective actions taken to determine if they were comprehensive enough. In the examples reviewed, the inspector did not observe any remedial assessments.

The inspector discussed these observations with the licensee. Overall, the corrective action program appeared to address specific problems very well. However, trending, assessment of the extent of the problems identified, and remedial assessments following corrective actions were areas that needed improvement. The licensee provided a copy of a presentation made to NRC Region IV management on December 6, 1996, immediately prior to this inspection. Within this presentation, the licensee identified problems with the corrective action program. As a result, the inspector's findings served to confirm the licensee's own evaluation of the need for an improvements in the corrective action process.

c. Conclusions:

Licensee self assessments were very good and provided probing insight into program performance. However, problems associated with corrective actions reduced the benefit gained from these assessments.

V. Management Meetings

X1 Exit Meeting Summary

The inspector presented the results of the inspection to members of licensee management at the conclusion of the inspection on December 13, 1996. The licensee acknowledged the findings presented.

The inspector asked the licensee whether materials examined during the inspections should be considered proprietary. No proprietary information was identified.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

S. Burkdoll, Supervising Instructor
T. Damashek, Supervisor Regulatory Compliance
R. Hammond, Supervisor Health Physics - Operations
J. Harris, Supervisor Health Physics - Support
E. Holman, Supervisor Health Physics - ALARA
B. McKinney, Plant Manager
C. Medenci, Supervisor Health Physics - Radwaste
G. Miller, Quality Specialist
C. Reekie, Engineering Specialist
C. Stone, Quality Specialist

NRC

J. F. Ringwald, Senior Resident Inspector

INSPECTION PROCEDURES USED

86750 Solid Radioactive Waste Management and Transportation of Radioactive
Materials
TI 2515/133 Implementation of Revised 49 CFR Parts 100-179 and 10 CFR Part 71

LIST OF DOCUMENTS REVIEWED

Documents Reviewed:

Procedures:

ADM 02-013	Revision 3	Supervisor Radwaste
RPP 07-101	Revision 3	Control of Radioactive Material Management Software and Databases
RPP 07-110	Revision 3	Solid Radwaste Packaging
RPP 07-120	Revision 9	Preparation and Shipment of Radioactive Waste
RPP 07-121	Revision 7	Preparation and Shipment of Radioactive Material
RPP 07-130	Revision 1	Verification of Free Standing Water in High Integrity Containers

Updated Safety Analysis Report:

Section 11.4, Solid Waste Management System

Self Assessment Reports:

SEL 95-046, "Radiological Waste Operations"

SEL 95-050, "Waste Composition Analysis"

SEL 96-021, "Health Physics Technician Training Program"

Quality Evaluation Surveillance Reports:

K15-003 S-3113 October 30, 1995 Radwaste Shipment 95-0027 and 95-0028

K15-003 S-3121 December 19, 1995 Primary Spent Resin Transfer

K15-003 S-3158 August 28, 1996 DOT Shipping Regulation Compliance

Problem Identification Reports:

95-2567 October 24, 1995 Trending PIR related to 8 valve mispositioning events in the radwaste system between 10/24/94 and 10/25/95.

95-2942 December 14, 1995 Two screwdrivers were found wedged between the access cover and retaining bracket on the spent resin transfer head.

96-0734 March 7, 1996 After air lines were purged, air did not get shut off in time to prevent the iron solvent waste tank from overflowing foam into the berm.

96-0913 March 20, 1996 Operator found HA CV-1118A in the open position when it should have been in the closed position.

96-1021	March 28, 1996	During performance of STS IC-636A, operator placed the access tunnel transfer fan in the stop position instead of the radwaste tunnel transfer fan.
96-1324	May 3, 1996	Review of Information Notice 96-14, "Degradation of Radwaste Facility Equipment at Millstone Nuclear Power Station, Unit 1" for applicability.
96-2372	September 24, 1996	Review of Information Notice 96-47, "Decommissioning Notifications for Disposal of Radioactive Waste by Land Burial Authorized Under Former 10 CFR 20.304, 20.302 and Current 20.2002" for applicability.
96-2517	October 10, 1996	Issues identified in Self Assessment SEL 96-021, "Health Physics Technician Training Program" associated with procedures and use of a "cheat sheet."
96-2885	November 6, 1996	During performance of STS IC-470B, one of the restoration steps was not performed.
96-3008	November 20, 1996	During performance of SYS HB-131, HB-V323 was found to be in an incorrect position.

Shipping Documentation Packages:

Shipment 96R43	April 15, 1996
Shipment 96C47	June 4, 1996
Shipment 96R55	June 21, 1996
Shipment 96R57	June 7, 1996
Shipment 96R63	July 23, 1996
Shipment 96C68	September 5, 1996
Shipment 96C72	October 9, 1996