

MAR 4 1988

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In Reply Refer To:
Docket: STN 50-482/86-19

Wolf Creek Nuclear Operating Corporation
ATTN: Bart D. Withers
President and Chief Executive Officer
P.O. Box 411
Burlington, Kansas 66839

Gentlemen:

Thank you for your letter of December 30, 1987, clarifying the commitment made in your October 22, 1986, response to our Notice of Violation dated September 26, 1986. We have reviewed your revised commitment and find it responsive to the revised requirements of 10 CFR 73.71 for reporting safeguards events. We will review your implementation of the revised 10 CFR 73.71 reporting requirements during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,
Original Signed By:
L. J. CALLAN

L. J. Callan, Director
Division of Reactor Projects

8803080516 880304
PDR ADOCK 0500C482
Q PDR

cc:
Wolf Creek Nuclear Operating Corporation
ATTN: Otto Maynard, Manager
of Licensing
P.O. Box 411
Burlington, Kansas 66839

Wolf Creek Nuclear Operating Corporation
ATTN: Gary Boyer, Plant Manager
P.O. Box 411
Burlington, Kansas 66839

Kansas Corporation Commission
ATTN: Robert D. Elliott, Chief Engineer
Fourth Floor, Docking State Office Building
Topeka, Kansas 66612-1571

Kansas Radiation Control Program Director

bcc: (see next page)

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ON SEPARATION THIS
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RIV:RPSB
RCCatwell/jt
3/1/88

C:PSP RPSB
RJEverett
3/1/88

C:PSP
LAYandall
3/1/88

C:DRP A
3/2/88

D:DRP
LJCallan
3/3/88

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IE-04

Wolf Creek Nuclear Operating
Corporation

-2-

bcc w/copy of licensee's response w/safeguards:

RIV Security File
P. A. Starcher, RSGB/NRR
Resident Inspector
R. D. Martin, RA
R. L. Bangart, DRSS
Security Inspector
Chief, RPSB
RPSB Security File

bcc w/copy of licensee's response w/o safeguards:

OMB IE-04

MIS

DRP

Lisa Shea, RM/ALF

Section Chief, DRP/A

RIV File

RSTS Operator

RPSB

Myron Karman, ELD, MNBB

DRS

R. E. Hall, DRSS

Project Engineer, DRP/A

W. L. Forney, RIII

Resident Inspector, RIII

P. O'Conner, NRR Project Inspector

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WOLF CREEK
NUCLEAR OPERATING CORPORATION

RECEIVE

JAN 4 1988

John A. Bailey
Vice President
Engineering and Technical Services

December 30, 1987

ET 87-0381

R. D. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Docket No. 50-482: Clarification of Commitment due
to Change in Safeguards Reporting Requirements

Dear Mr. Martin:

The purpose of this letter is to clarify a commitment made in response to Violation 482/8619-03 in regard to reportability of a security event. This clarification is needed because of changes which were made to 10 CFR 73.71 reporting requirements.

In response to Violation 482/8619-03, a commitment was made to report unanticipated losses of both security computers to the NRC via ENS within 24 hours with a 5 day follow-up written report. It was stated that these reporting requirements would be continued until final resolution of reporting requirements has been obtained.

On October 8, 1987, the requirements for reporting safeguards events changed, including the requirements for 24 hour ENS phone calls and 5 day reports. Since the requirements of 10 CFR 73.71 have changed, unanticipated losses of both security computers are now being reported in accordance with the new reporting requirements.

Under the new reporting requirements, Wolf Creek Nuclear Operating Corporation is recording these events within 24 hours and submitting them in the quarterly log of safeguards events. This position was discussed with R. Erickson of Nuclear Reactor Regulation and Region IV personnel.

If you have any questions concerning this matter please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,

John A. Bailey

John A. Bailey
Vice President
Engineering and Technical Services

BDW/llk

cc: J. E. Cummins (NRC)
P. W. O'Connor (NRC), 2
Document Control Desk (NRC)

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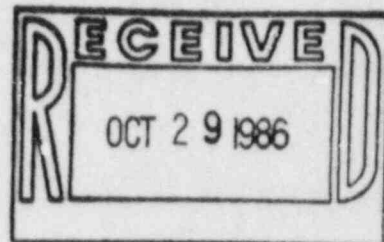


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

October 22, 1986

Mr. E. H. Johnson, Director
Division of Reactor Safety and Projects
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 100
Arlington, Texas 76011



KMLNRC 86-194
Re: Docket No. STN 50-432
Subj: Response to Inspection Report STN 50-482/86-19

Dear Mr. Johnson:

This letter is written in response to your letter of September 26, 1986, which transmitted Inspection Report STN 50-482/86-19. As requested, the violations (482/8619-01, 02, and 03) identified in the Inspection Report are being addressed in four parts.

- (a) The reason for the violations if admitted;
- (b) The corrective steps which have been taken and the results achieved;
- (c) Corrective steps which will be taken to avoid further violations; and
- (d) The date when full compliance will be achieved.

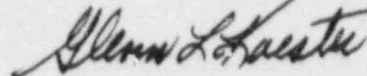
Kansas Gas and Electric Company (KG&E) believes that violation 8619-03 resulted from a change in interpretation of 10 CFR 73.71(c) by the NRC Region IV inspectors. In accordance with 10 CFR 50.109 "Backfitting" and NRC Manual Chapter 0514 "NRC Program for Management of Plant-Specific Backfitting of Nuclear Power Plants", KG&E requests that NRC Region IV perform a backfit determination on this change. Supporting rationale for this request is included in the attached response to the violation. KG&E believes this request is consistent with Mr. Stello's March 3, 1986, letter to Mr. Wilson Cadman which encouraged utilities to become familiar with the backfit process and to identify potential backfit items.

Attachment A contains Safeguards Information in accordance with 10 CFR 73.21 and therefore should be withheld from public disclosure. This letter, when separated from the attachment does not contain Safeguards Information and should be handled as decontrolled.

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If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff. Acknowledgement of receipt of this letter by signing the enclosed receipt form and returning it to KG&E would be appreciated.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:see

Attachment

cc: PO'Connor (2), w/o
Cummins, w/o
J.aylor, w/a