

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Richard A. Muench
President and Chief Executive Officer

January 27, 2003
WM 03-0005

U. S. Nuclear Regulatory Commission
ATTN: Mr. Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
Mail Stop 5-E7
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Reference: Letter dated January 7, 2003, from S. J. Collins, USNRC, to David Erbe, WCNOG, (Order Modifying License dated January 7, 2003)

Subject: Docket: 50-482: Wolf Creek Nuclear Operating Corporation's (WCNOG's) Twenty-Day Response to NRC Issuance of Order For Compensatory Measures Related to Access Authorization

Gentlemen:

The Reference issued a U.S. Nuclear Regulatory Commission (NRC) Order to WCNOG that modifies the current operating license for Wolf Creek Generating Station, Unit 1. The Order was effective immediately and requires compliance with specific safeguards and security compensatory measures as stated in Attachment 2 to the Order.

The Order requires a twenty-day response. Attachment 1 to this letter provides the twenty-day response for WCNOG. Attachment 2 provides WCNOG's schedule for implementation of each item of Attachment 2 of the Order.

WM 03-0005
Page 2 of 2

This response is hereby submitted to the Commission in accordance with 10 CFR 50.4 and 10 CFR 2.202.

If you have any questions concerning this matter, please contact me at (620) 364-4000, or Mr. Tony Harris at (620) 364-4038.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. Muench', written in a cursive style.

Richard A. Muench

RAM/rlg

Attachment 1: Twenty-day Response to Order
Attachment 2: Schedule for Implementation

cc: J. N. Donohew (NRC), w/a
D. N. Graves (NRC), w/a
E. W. Merschoff (NRC), w/a
Senior Resident Inspector, w/a (NRC)

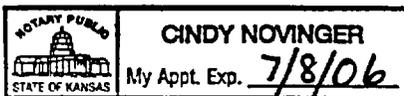
STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Richard A. Muench, of lawful age, being first duly sworn upon oath says that he is President and Chief Executive Officer of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the contents thereof; that he has executed the same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By *RMuench*
Richard A. Muench
President and
Chief Executive Officer

SUBSCRIBED and sworn to before me this 27th day of January, 2003.

Cindy Novinger
Notary Public



Expiration Date July 8, 2006

20-Day Response to NRC Order Dated January 7, 2003

The NRC order of January 7, 2003 includes the following reporting requirements:

III.

- B. 1. All Licensees shall, within **twenty (20) days** of the date of this Order, notify the Commission (1) if they are unable to comply with any of the requirements described in Attachment 2, (2) if compliance with any of the requirements is unnecessary in their specific circumstances, or (3) if implementation of any of the requirements would cause the Licensee to be in violation of the provisions of any Commission regulation or the facility license. The notification shall also provide justification for seeking relief from or variation of any specific requirement.
2. Any Licensee that considers that implementation of any of the requirements described in Attachment 2 to this Order would adversely impact safe operation of the facility must notify the Commission, within **twenty (20) days** of the date of this Order, of the adverse safety impact, the basis for its determination that the requirement has an adverse safety impact, and either a proposal for achieving the same objectives specified in the Attachment 2 requirement in question, or a schedule for modifying the facility to address the adverse safety condition. If neither approach is appropriate, the Licensee must supplement its response to Condition B.1 of this Order to identify the condition as a requirement with which it cannot comply, with attendant justifications as required in Condition B.1.
- C. 1. All Licensees shall, within **twenty (20) days** of the date of this Order, submit to the Commission, a schedule for achieving compliance with each requirement described in Attachment 2.
2. All Licensees shall report to the Commission when they have achieved full compliance with the requirements described in Attachment 2.

Wolf Creek Nuclear Operating Corporation's (WCNOC's) Response:

- B. 1. WCNOC will, to the extent permitted under existing Federal and state statutes and laws, implement the access authorization compensatory measures per the NRC order dated January 7, 2003. WCNOC recognizes that industry guidance on the compensatory measures (CMs) has not been finalized nor endorsed by the NRC. Ongoing interpretation of the CMs may reveal conflicts with applicable laws. If any conflicts are identified, WCNOC will notify the NRC.
- 2. Implementation of the requirements described in Attachment 2 to the Order would not adversely impact safe operation of WCNOC.
- C. 1. Attachment 2 to this letter specifies WCNOC's schedule for achieving compliance with each requirement described in Attachment 2 to the Order. In each case, the schedule for achieving compliance satisfies the schedule requirements prescribed in the Order.
- 2. WCNOC will report to the Commission when full compliance with the requirements in Attachment 2 to the Order has been achieved.

**Implementation Schedule
for
Attachment 2 of NRC Order Dated January 7, 2003**

Compensatory Measure	Subject	Schedule for Implementation
B.	Unescorted Access Authorization Measures	
B.1.1	Special Case Temporary Unescorted Access	April 7, 2003
B.1.2	Access Categories	July 7, 2003
B.1.3	Verify True Identity	July 7, 2003
B.1.4	Initial Unescorted Access	July 7, 2003
B.1.5	Updated Unescorted Access	July 7, 2003
B.1.6	Psychological Evaluation	July 7, 2003
B.1.7	Reinstated Access	July 7, 2003
C.	Access Authorization Program Measures	
C.1.1	Implement Common Vehicle (PADS)	July 7, 2003
C.1.2	Access Denial Measures	July 7, 2003
C.1.3	Personnel Follow-up Measures	July 7, 2003
C.1.4	10 CFR 26 Violation Notification	July 7, 2003
C.1.5	NRC Denied Access Actions	July 7, 2003
C.1.6	Conduct Reinvestigations	January 7, 2004
C.1.7	Screening of Background Investigators	July 7, 2003
C.1.8	Enhance Behavioral Observation	January 7, 2004
C.1.9	Audit of Access Authorization Program	July 7, 2003
C.1.10	Management of Personnel Information	July 7, 2003