

WOLF CREEK NUCLEAR OPERATING CORPORATION

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Manager Regulatory Affairs

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

Subject: Docket No. 50-482: Changes to Wolf Creek Generating
Station Radiological Emergency Response Plan Implementing
Procedures and Forms

Gentlemen:

In accordance with 10 CFR 50, Appendix E, enclosed are revisions to Wolf Creek
Generating Station Radiological Emergency Response Plan implementing procedures
and forms. The following is a list of the specific enclosures.

PROCEDURES

Effective September 27, 2003

EPP 06-009, Revision 2 (Corrected Copy)

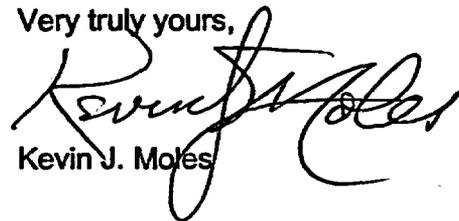
FORMS

Effective September 4, 2003

EPF 06-004-01, Revision 9 (Corrected Copy)

If you have any questions concerning this submittal, please contact me at (620) 364-
4126 or Ms. Jennifer Yunk at (620) 364-4272.

Very truly yours,



Kevin J. Moles

KJM/rlg

Enclosures

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AD45



EPP 06-009

DRILL AND EXERCISE REQUIREMENTS

Responsible Manager

Manager Resource Protection

Revision Number	2
Use Category	Reference
Administrative Controls Procedure	No
Infrequently Performed Procedure	No
Program Number	06

DC2 09/27/01

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1.0 PURPOSE

1.1 This procedure provides guidance for developing and implementing the emergency preparedness drill and exercise program, and for documenting information and historical data for event reconstruction.

2.0 SCOPE

2.1 A drill and Exercise program is necessary to ensure that the Emergency Response Organization (ERO) is capable of determining an emergency condition at Wolf Creek Generating Station (WCGS), assess the consequences, notifying key licensee and non- licensee personnel and organizations, making onsite protective action decisions, recommending off-site protective actions, and maintaining logs and records for event reconstruction.

3.0 REFERENCES AND COMMITMENTS

3.1 References

- 3.1.1 Wolf Creek Generating Station Radiological Emergency Response Plan
- 3.1.2 FEMA REP-14, Radiological Emergency Preparedness Exercise Manual
- 3.1.3 NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
- 3.1.4 NRC Inspection Procedure 71114
- 3.1.5 WCGS Fire Protection Program
- 3.1.6 PIR 96-2859, Incomplete Turnover Sheets

3.2 Commitments

- 3.2.1 RCMS 85-316, Submittal of the Scenario and Licensee Actions to the NRC
- 3.2.2 RCMS 85-317, Submittal of Goals and Guidelines to the NRC
- 3.2.3 RCMS 88-131, Response To Notice Of Violation 481/8812-01, Requirement For Continuing Quarterly Callout Drills

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4.0 DEFINITIONS

4.1 Controllers

4.1.1 Personnel responsible for providing messages and scenario data to participants during a drill or Exercise.

4.2 Critique

4.2.1 A meeting to evaluate and critically analyze the ability of organizations to respond as described in the RERP and Emergency Planning Procedures.

4.3 Drill

4.3.1 A supervised activity used to develop and maintain skills in a particular operation.

4.4 Drill Lead Controllers

4.4.1 Personnel who are assigned the responsibility for providing overall management and technical direction for drills and exercises.

4.5 Evaluators

4.5.1 Personnel who are assigned the responsibility for documenting and evaluating the actions of the controllers and players in response to a drill or exercise.

4.6 Exercise

4.6.1 An event that incorporates the integrated capability of the basic elements existing within the Radiological Emergency Response Plan (RERP), State and County Emergency Plans and associated organizations. An exercise simulates a radiological emergency condition requiring the response of off-site agencies and graded biennial exercises are evaluated and critiqued by FEMA/NRC officials.

4.7 Facility Lead Controllers

4.7.1 Personnel who are assigned the responsibility for coordinating controller activities in a specific facility during a drill or exercise.

4.8 Logs

4.8.1 A chronological listing of events and actions taken by ERO personnel.

4.9 Participants

4.9.1 Those Emergency Response Organization members who have been assigned a role to respond to an emergency.

4.10 Records

4.10.1 Documents such as calculation worksheets, computer printouts, forms, logs, memos, checklists, or any paper used to record data or information during an emergency, drill or exercise which may be used for event reconstruction.

4.11 Scenario

4.11.1 An outline of a simulated chain of emergency events used for a drill or exercise.

5.0 RESPONSIBILITIES

5.1 Superintendent Emergency Planning

5.1.1 Coordinates the development of a drill and exercise program and schedule with the NRC, FEMA, State, Coffey County and other participating agencies.

5.1.2 Ensures the Emergency Planning Exercise is conducted as set forth in guidelines agreed upon with the NRC, FEMA, State, Coffey County, and other participating agencies.

5.1.3 Provides the necessary support to assure that State, Coffey County and other participating agency personnel mobilize and provide off-site emergency response resources to an exercise scenario.

5.1.4 Ensures development of scenarios for drills and exercises.

5.1.5 Approves the assignment of qualified controllers and evaluators at participating facilities.

5.1.6 Provides Regulatory Compliance with exercise objectives/exercise scenario five working days prior to the NRC's requested submittal date for each item in accordance with NRC Inspection Procedure 71114. [Commitment Steps 3.2.1 and 3.2.2]

5.1.7 Provide FEMA with exercise objectives/exercise scenario by FEMA's requested submittal date for each item in accordance with FEMA REP-14. This submittal is not to be transmitted through the State of Kansas so that the confidentiality of the scenario remains uncompromised. However, the State shall concur with and be aware of the direct submittal of the scenario to FEMA.

5.1.8 Assures the health and safety of participants during drills and exercises in accordance with SP-808, DRILL AND EXERCISE SAFETY.

5.2 Emergency Response Organization Personnel

5.2.1 For completing and maintaining logs and records in a neat and orderly fashion during an emergency, drill, or exercise.

5.3 Drill Lead Controller

5.3.1 Provide overall management and technical direction of the drill or Exercise.

5.3.2 Identify and evaluate potential health and safety hazards during a drill or Exercise.

5.4 Facility Lead Controllers

5.4.1 Perform responsibilities as assigned prior to and during a drill or Exercise.

5.5 Controllers and Evaluators

5.5.1 Perform responsibilities as assigned prior to and during a drill or Exercise.

6.0 PRECAUTIONS/LIMITATIONS

6.1 None

7.0 PROCEDURE

7.1 Exercises And Drills

7.1.1 Exercises are conducted to evaluate the basic elements and capabilities of WCGS and off-site organizations to respond to off-site radiological releases.

- o At least once every six years, one exercise or drill shall start between 6:00 p.m. and 4:00 a.m. for WCNOG facilities and off-site organizations. Some exercises should be unannounced.
- o The necessary arrangements are made for official evaluators from Federal, State and local governments and WCNOG to observe, evaluate and critique graded biennial exercises.

7.1.2 Drills are used to develop and maintain skills in particular areas. Drills are used to evaluate personnel proficiency and to allow hands-on training and practical experience.

7.1.3 A single drill may incorporate more than one drill requirement. The graded exercise is not to be used to satisfy the requirement for these drills.

7.1.4 Communications Drills ensure communications between WCGS and off-site organizations is possible and that the content of messages is understood.

1. Communication tests with local, State and Federal agencies are performed in accordance with EPP 06-009, MAINTENANCE OF EMERGENCY FACILITIES AND COMMUNICATION CHECKS.

7.1.5 Health Physics Drills

1. Semi-annual Health Physics drills include response to and analysis of simulated elevated airborne and liquid samples, and direct radiation measurements in the environment
2. Annual Health Physics drills include analysis of in-plant Reactor Coolant liquid samples.

7.1.6 Medical Emergency Drills

1. Annual Medical Emergency drills should include transportation and treatment of simulated contaminated individuals by ambulance and off-site medical treatment facilities. Off-site portions of the drill may be performed as part of the required annual exercise.

7.1.7 Radiological Monitoring Drills

1. Annual Radiological Monitoring drills include both onsite and off-site collection and analysis of sample media, field activities, and provisions for communications and record keeping.

7.1.8 Call-Out Drills

1. Quarterly Call-Out drills demonstrate augmentation capabilities of the ERO to staff the Emergency Response Facilities. This drill does not normally include mobilization. [Commitment Step 3.2.3]

7.2 Logs And Records

- 7.2.1 Entries shall be as accurate, legible, and concise as possible. All data on forms should be entered or marked N/A if not applicable.
- 7.2.2 Any information that will assist in reconstruction of the response history such as plant status at time of emergency declaration, major steps taken by facilities to mitigate the emergency, plant status changes, and field team reports shall be entered as it is received.
- 7.2.3 Information entered in the log after the fact should be marked Late Entry (LE) and the time of the event entered as the next log entry.
- 7.2.4 Corrections should be made by placing one line through the incorrect entry, initialing, dating, and entering the correction.
- 7.2.5 Information written in logs, forms, or on any paper during an emergency, drill, or exercise should be considered as a record. All information could be vital for event reconstruction.

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7.3 Scenarios

7.3.1 Scenarios should be realistic and challenging. Results of previous drills, exercises and industry information should be included if they enhance the scenario. Enough data should be included for specific events, such as an equipment failure, so that response teams can realistically respond.

7.3.2 Exercise scenarios are varied each year to assure that all major elements of the emergency response plans and procedures for WCGS and off-site organizations are tested within a six-year period.

7.3.3 Scenarios should describe how drills or exercises are to be performed to allow decision making and to describe the following:

1. Basic objectives and appropriate evaluation criteria
2. Date(s), time period, place(s), and participating organizations
3. Simulated events
4. Meteorological information
5. Time schedule of real and simulated initiating events
6. Narrative summary describing the conduct of the scenario should include descriptions of:
 - a. Simulated casualties
 - b. Off-site fire department assistance
 - c. Rescue of personnel
 - d. Use of protective clothing
 - e. Deployment of radiological monitoring teams
 - f. Public information activities
 - g. Completed Shift Manager's turnover sheet

7.3.4 The objectives and guidelines of scenarios should remain confidential to all except those with a need to know.

1. Participants of Graded Exercises shall not have prior knowledge of the scenario.

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2. Data for drills should be treated discreetly, however knowledge of the scenario will not preclude participation in the drill.

7.4 Conduct Of Drills And Exercises

NOTES

- o Callout and tabletop drills are not addressed in this section.
- o Except in certain circumstances where it is more practical to combine the controller and evaluator functions, evaluators for drills and Exercises are separate personnel.

- 7.4.1 Controllers and evaluators are designated and indoctrinated to their roles and responsibilities prior to drills and exercises.
- 7.4.2 Within 24 hours of the start of the drill or exercise, the Drill Lead Controller should evaluate potential health and safety hazards which may affect the conduct of the drill or exercise.
- 7.4.3 IF during a drill or exercise individual activities are identified which affect the safety of a participant or which could compromise plant operations, THEN the activity should be stopped or altered.
- 7.4.4 Facility Lead Controllers should ensure attendance sheets are completed and facility records are gathered and submitted to Emergency Planning for retention.

7.5 Critiques

- 7.5.1 Critiques involve key participants, controllers and evaluators, and are conducted as soon as practicable following an emergency, exercise or drill.
- 7.5.2 Critique items identified as needing improvement will be documented by one of the following:
1. Performance Improvement Request
 2. Work Requests
 3. Training Evaluation Tools
 4. Other communication processes

8.0 INITIAL ACTIONS

- 8.1 None

9.0 SUBSEQUENT ACTIONS

9.1 None

10.0 RECORDS

10.1 Records generated by this procedure during an actual emergency are considered lifetime QA records and shall be forwarded to Emergency Planning at the termination of the emergency.

10.2 Records generated by this procedure during drills or exercises are considered non-QA records and shall be forwarded to Emergency Planning at the termination of the drill or exercise.

11.0 FORMS

11.1 EPF 06-009-01, EMERGENCY RESPONSE LOG

PUBLIC INFORMATION ORGANIZATION ACTIVATION CHECKLIST

Check When Completed	<u>All steps required--Within each level</u>
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Joint Information Clearinghouse (JIC) Activation

	WC PIO position staffed.
	WC Public Information Manager position staffed.
	(1) WC Technical Support position staffed.
	News Writer position staffed.
	JIC telephones available with dial tone.
	Fax, copier, computer or alternative capability operational.
	On-site PIC contacted for status update.
	Clocks synchronized with Control Room.
	Notify State PIO, 785-274-1192, cell: 785-249-5323 (Alt) 785-274-1117, cell: 816-729-5154
JIC Activation Date: ___ / ___ / ___ Time: _____	
Notify of facility activation	
	On-site PIC 620-364-4152 or ext. 5396
	Off-site PIC 620-364-8831 ext. 5372
	KGE/Westar Inc. (Pri) 316-261-6263, (Alt) 785-575-8411
	KEPCO (Pri) 785-271-4842, (Alt) 785-271-4802
	KCPL (Pri) 816-556-2365, (Alt) 816-835-5720

Rumor Control will notify PIO/PIM when activated	
	Rumor Control (KCPL), 816-556-2269

Phone Team Activation

	Phone Team Manager indicates activation checklist complete
	Notify State PIO.
NOTE:	
Activation can occur before JIC activates--with State PIO approval.	
Phone Team Activation Date: ___ / ___ / ___ Time: _____	

Media Center Activation

	Media Center Manager indicates Stage 1 activation checklist complete
	Notify State PIO.
	Media Center Manager indicates Stage 2 activation checklist complete
Media Center Stage 1 Activation Date: ___ / ___ / ___ Time: _____	
Media Center Stage 2 Activation Date: ___ / ___ / ___ Time: _____	

Public Information Manager	/ /	Time
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