

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Matthew W. Sunseri
Vice President Operations and Plant Manager

August 6, 2008
WO 08-0022

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

Reference: 1) Letter WM 08-0004, dated February 8, 2008, from R. A. Muench, WCNOC, to USNRC
2) Letter dated July 2, 2008, from USNRC, to R. A. Muench, WCNOC

Subject: Docket No. 50-482: WCNOC's Response to NRC Request for Additional Information Related to NRC Bulletin 2007-01, "Security Officer Inattentiveness"

Gentlemen:

Reference 1 provided Wolf Creek Nuclear Operating Corporation's (WCNOC) written response to NRC Bulletin 2007-01, "Security Officer Attentiveness." On July 2, 2008, Reference 2 was issued by the NRC to request additional information required to complete their assessment of WCNOC's response to NRC Bulletin 2007-01.

The attachment to this letter lists the eight (8) specific questions/requests contained in Reference 2 with WCNOC's response following each question/request.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4008, or Mr. Richard Flannigan at (620) 364-4117.

Sincerely,



Matthew W. Sunseri

MWS/rit

Attachment – WCNOC's Response to NRC Request for Additional Information

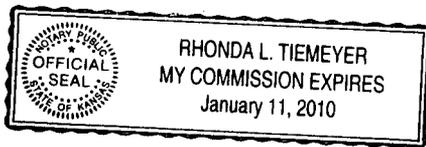
cc: E. E. Collins (NRC), w/a
V. G. Gaddy (NRC), w/a
B. K. Singal (NRC), w/a
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Matthew W. Sunseri, of lawful age, being first duly sworn upon oath says that he is Vice President Operations and Plant Manager 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 *MW Sunseri*
Matthew W. Sunseri
Vice President Operations and Plant Manager

SUBSCRIBED and sworn to before me this 6th day of August, 2008.



 Rhonda L. Tiemeyer
Notary Public

Expiration Date *January 11, 2010*

**Wolf Creek Nuclear Operating Corporation's (WCNOC) Response to Specific Questions
in
NRC Request for Additional Information Related to Bulletin 2007-01: Security Officer
Attentiveness**

QUESTION/REQUEST 1 (supplement to response 1a)

Describe the process for security post rotations including the rotation process for isolated positions.

Include the following information in your response:

A description of the security post rotation process including, but not limited to: (1) a discussion of the types of posts a typical security officer would rotate through during a normal shift; (2) a discussion on whether the type of activity (i.e., roving or foot patrol or stationary in a Bullet Resisting Enclosure (BRE)) performed at each individual post is taken into consideration when a security officer moves from post to post throughout the shift; and (3) the length of time at each post. When responding, particular emphasis should be placed on whether the licensee takes into consideration the activities associated with each post assignment when formulating their post rotation schedules for each shift (i.e., rotating from foot patrol to BRE to Vital Area patrol or rotating from BRE to ready room to BRE etc.).

WCNOC RESPONSE

1) A discussion of the types of posts a typical security officer would rotate through during a normal shift:

Bullet Resistant Enclosures (BRE), foot patrols, vehicle patrols (Protected Area (PA) and Owner Controlled Area (OCA)), vehicle checkpoint (OCA and PA), Central Alarm Station (CAS), Secondary Alarm Station (SAS) and SAS Jr.

2) A discussion on whether the type of activity performed at each individual post is taken into consideration when a security officer moves from post to post throughout the shift.

Yes, Wolf Creek utilized the NEI "Security Post Evaluation Guidance" documents to rank each post and assist us in establishing our post rotation. The posts are ranked 1, 2, or 3, with 1 being the best conditions. Wolf Creek does not currently have any level 3 posts. From this ranking we set up our rotation to eliminate having two isolated posts back to back as much as possible. We currently have one situation where there are two isolated posts back to back.

3) The length of time at each post

All posts are rotated on a two hour rotation except for CAS/SAS, which is three hours. During outages post rotations are increased to every 1-hour except CAS/SAS.

QUESTION/REQUEST 2 (supplement to response 1b)

Describe any licensee processes or programs that are in place to identify problems in climate controlled security areas. What methods are used to track, inspect, and ensure timely repairs are completed?

Include the following information in your response:

A description of how the security areas are maintained including, but not limited to: (1) a discussion of the maintenance and/or preventive maintenance process and programs in place for these security areas including an overview and brief discussion on routine inspection schedules by maintenance personnel; (2) a discussion on the process a security officer can follow to report concerns with the upkeep and maintenance of his or her post; and (3) a discussion on the timeliness of repairs and any follow-up actions taken by the licensee to ensure the repairs are completed and resolved adequately.

WCNOC RESPONSE

1) A discussion of the maintenance and/or preventive maintenance process and programs in place for these security areas including an overview and brief discussion on routine inspection schedules by maintenance personnel;

A work request is generated when maintenance is needed on the equipment; preventive maintenance is done quarterly (filter media and energy exchange element) and annually (condenser coil and energy exchange element).

2) A discussion on the process a security officer can follow to report concerns with the upkeep and maintenance of his or her post;

Concerns are typically handled by writing a corrective action report, if equipment is actually broke or malfunctioning the officer will either write a work request or report it to their supervisor who will in turn write the work request.

3) A discussion on the timeliness of repairs and any follow-up actions taken by the licensee to ensure the repairs are completed and resolved adequately?

Maintenance responds to the post in a timely manner to troubleshoot the problem and fix it (especially during the hot summer months). We do have Temporary AC units that we can place in the posts if needed. We are currently evaluating a replacement for the AC units in the BRE's due to recurring problems.

QUESTION/REQUEST 3 (supplement to response 1)

Are security personnel provided opportunities to participate in any personnel surveys regarding the work environment? If so, what is the frequency of the surveys, the average participation rate of security personnel as compared to the general site average, and the process for providing feedback and addressing the results from the survey?

WCNOC RESPONSE

Yes, Security personnel are provided opportunities to participate in station surveys regarding work environment including periodic industry nuclear safety culture surveys and station organizational effectiveness surveys normally performed every three years.

A station team made up of management and employees is responsible for development of action plans to close gaps from the organizational effectiveness surveys.

Results are communicated station wide and divisional survey results including written comments and percentage of participation are provided directly back to the Security management team and communicated through the crews.

The last organizational survey was performed in 2006 and although we do not have divisional participation percentages for that survey the site participation was at 90 percent with all security personnel having been invited to participate. More recently, a 2007 culture survey of 175 personnel on site resulted in 100 percent of the security personnel requested to participate doing so.

A station wide nuclear safety culture assessment survey was recently completed at the station.

QUESTION/REQUEST 4 (supplement to response 1)

How is the licensee's policy regarding site employee attentiveness and/or inattentiveness communicated to personnel, both licensee and contractor, and at what frequency?

WCNOC RESPONSE

Personnel are expected to be physically and mentally fit for duty when they report to and while at work at Wolf Creek. Physically fit includes not being fatigued, which can lead to inattentiveness. The station policy on attentiveness is communicated through the site Fitness for Duty program that requires an annual requalification for all badged personnel.

Inattentiveness expectations are reinforced through station communication programs (weekly newsletters, station bulletins, and guaranteed communications). To monitor and allow open feedback on attentiveness concerns from security personnel and other shift workers, Wolf Creek implemented a back shift management observation program.

QUESTION/REQUEST 5 (supplement to response 2)

Describe the process for employees to file reports through the site corrective action program (CAP). Can employees file CAP reports without prior supervisor/management review or approval?

Include the following information in your response:

Describe the process for employees to file reports through the CAP. Discuss the supervisor/management review and/or approval process including, but not limited to: (1) does a supervisor/manager have the authority to reject a report before entering it into the CAP without additional management review and approval; and (2) does a supervisor/manager have the authority to modify the report before such report has been entered into the CAP?

WCNOC RESPONSE

The employee logs into the CAP program (PILOT) and completes the form for a Condition Report (CR) then forwards it through the system. It goes to a reviewer to ensure there is no safety significance and then forwarded to the screening review team then assigned to the responsible group. Once a CR is written it cannot be changed and only the originator can cancel it. Employees have the option to initiate an anonymous CR.

1) Does a supervisor/manager have the authority to reject a report before entering it into the CAP without additional management review and approval:

No, the system will not allow the supervisor/manager to reject a report.

2) Does a supervisor/manager have the authority to modify the report before such report has been entered into the CAP?

No, anyone can write a CR and it cannot be modified once it is written.

QUESTION/REQUEST 6 (supplement to response 2)

Can employees view the status and disposition of reports directly, or must this information be requested? If yes, please describe the process.

WCNOC RESPONSE

Yes, the PILOT software system allows any employee to view the status and results of a CR.

QUESTION/REQUEST 7 (supplement to response 4)

Are formal assessments of the security program conducted by organizations/individuals that do not have direct responsibility for the security program? If so, provide information on the process, including, but not limited to, the organizations and levels of management involved, the frequency of such activities, and any tracking of how findings are resolved.

WCNOC RESPONSE

Yes, our Quality Assurance group conducts assessments of the security program as required by the security plan once every 2 years; these audits are conducted by QA personnel and reviewed by upper management (VP level). All findings and observations are placed in the company corrective action program.

QUESTION/REQUEST 8 (supplement to response 5)

How do you assess the effectiveness of your oversight of contractors and subcontractors?

Include the following information in your response:

Describe the licensee's program for oversight of contractors and subcontractors including, but not limited to: (1) a brief overview and description of licensee's procedures that describe the oversight process; (2) a detailed list (bulleted is preferred) of assigned duties for the licensee supervisor(s) or manager(s) responsible for overseeing contractors and subcontractors at the site; (3) a detailed list (bulleted is preferred) of the assigned duties for the contractor and subcontractor supervisor(s) or manager(s) responsible for overseeing the contractor and subcontractor staff at the site; and (4) a brief discussion of the corporate (management) involvement with the oversight of contractors and subcontractors at the site.

WCNOC RESPONSE

1) A brief overview and description of licensee's procedures that describe the oversight process;

Procedure AP 24B-001 "Control of Site Contractor Services" describes that a Wolf Creek representative is responsible for coordinating contractor personnel activities.

2) A detailed list (bulleted is preferred) of assigned duties for the licensee supervisor(s) or manager(s) responsible for overseeing contractors and subcontractors at the site;

- **Indoctrination**
- **Training**
- **Material and equipment receiving**
- **Industrial safety**
- **Scheduling**
- **Wolf Creek Support**
- **Security**
- **Behavior Observation**

3) A detailed list (bulleted is preferred) of the assigned duties for the contractor and subcontractor supervisor(s) or manager(s) responsible for overseeing the contractor and subcontractor staff at the site;

All contractors are assigned to a Wolf Creek Supervisor who is responsible for oversight.

4) A brief discussion of the corporate (management) involvement with the oversight of contractors and subcontractors at the site.

When a contractor is badged they are assigned to a Wolf Creek supervisor who is responsible for oversight at the site.