

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Matthew W. Sunseri
President and CEO

September 30, 2011

WM 11-0011

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Reference: Letter dated September 1, 2011, from E. E. Collins, USNRC, to M. W. Sunseri, WCNOG

Subject: Docket No. 50-482: 30 Day Response to Mid-Cycle Performance Review and Inspection Plan – Wolf Creek Generating Station

Gentlemen:

The Reference provided the Nuclear Regulatory Commission's (NRC) mid-cycle performance review and inspection plan for Wolf Creek Generating Station (WCGS). The Reference requested Wolf Creek Nuclear Operating Corporation (WCNOG) provide a written response with details of corrective actions planned to address WCNOG's substantive cross-cutting issues in [P.1(c)] (thoroughness of evaluating problems such that resolutions address causes and extent of condition), [P.1(d)] (appropriateness and timeliness of corrective actions), and [H.2(c)] (completeness and accuracy of design documentation, procedures, and work packages), and the new substantive cross-cutting issues in [P.1(a)] (use of a low threshold for identifying issues in the corrective action program) and [H.1(b)] (use of conservative assumptions in decision-making). This response includes a schedule outlining when WCNOG will be ready for inspection of our corrective actions for each of the safety culture themes, as requested in the Reference.

WCNOG recognizes that there has been a concern with performance in a number of different human performance and problem identification and resolution cross-cutting areas. As a result, WCNOG has implemented key corrective actions including changes to the oversight role of the Corrective Action Review Board, single point of entry for condition reports and work requests, and development of several challenge boards to monitor evaluation quality. Corrective actions currently in progress build upon the actions previously taken. The Attachment describes the relationship between the corrective actions implemented earlier and the corrective actions being taken now.

ADD
NRC

Based on planned completion dates for the corrective actions being taken, and to allow for interim effectiveness reviews, WCNOG anticipates readiness for inspection in the area of problem identification and resolution late in the first quarter of 2012. WCNOG anticipates readiness for inspection in the area of human performance in the second quarter of 2012.

There are no commitments contained in this letter. If you have any questions concerning this matter, please contact me at (620) 364-4008, or Mr. Gautam Sen, Manager Regulatory Affairs at (620) 364-4175.

Sincerely,



Matthew W. Sunseri

MWS/rt

Attachment – Corrective Actions for Substantive Cross-cutting Issues

cc: E. E. Collins (NRC), w/a
J. R. Hall (NRC), w/a
G. B. Miller (NRC), w/a
Senior Resident Inspector (NRC), w/a

Historical Overview

Throughout the time that the substantive cross-cutting issues have existed, Wolf Creek Nuclear Operating Corporation (WCNOC) has continued to improve the corrective action program (CAP) to better address the issues in cross-cutting aspects. In addition to CAP improvements, WCNOC has raised management standards, and focused on safety culture.

During the preparation for the 95002 Inspection that resulted from WCNOC having three white performance indicators, a thorough review of all the condition reports (CR) related to NRC findings was conducted. The results of this review found that the previous evaluations were too narrowly focused on the specific problem area, and had missed the overall point that the review of a substantive cross-cutting issue should have made evident. This was due in part to the failure to fully consider all of the human performance and problem identification and resolution cross-cutting area components. These CRs were re-evaluated. The re-evaluations concluded that there were underlying issues in station management, CAP, and safety culture that allowed each of the individual findings to occur.

A review of the additional findings accrued since those considered as part of the 95002 Inspection was conducted under CR 34455, "Ongoing Substantive Issues," and CR 34465, "New Substantive Issue in [H.2(c)]." These CRs, along with the conclusions from earlier evaluations, were reviewed in the areas of the substantive cross-cutting issues identified at that time. The evaluation results supported and reinforced the conclusions of the 95002 Inspection preparation effort and found fundamental problems with station management, CAP, and safety culture that led to the circumstances that allowed each of these findings to occur.

WCNOC is taking the following actions to address these three areas.

Corrective Actions Being Taken

1. In July 2011, WCNOC started a leadership assessment process. The goal of the leadership assessments is to identify and resolve management performance and alignment concerns within Operations, Engineering, Maintenance, Integrated Plant Scheduling and Training. The process involves multi-tiered interviews and feedback sessions with executives, managers, superintendents and supervisors. Having the chain of command involved in the interviews enables clear standards and behavioral expectations to be reinforced without any interpretation. Each interviewee receives a feedback session and input for their individual development plan. This action is scheduled for completion on November 15, 2011. (Reference CR 34886)
2. "Safety Culture, - What's at Stake - Focus on: Human Performance" training began in the third quarter of 2011 and is on-going. This training expanded on the Nuclear Safety Culture training conducted in 2010 by incorporating how human performance elements can impact plant performance and negatively effect safety culture. This action is ongoing. (Reference CR 25896)
3. A Corrective Action Backlog Reduction Initiative is in place with the goal of significantly reducing the corrective action backlog by the end of 2011. This action is intended to reduce the accumulation of long-standing issues that consume resources and leave the station vulnerable to repeat events. Metrics have been established to monitor the

backlog reduction. This action is scheduled for completion on December 15, 2011. (Reference CRs 34455, 34465)

4. CAP metrics have been revised to ensure station management uniformly and effectively enforces timeliness of, and effectiveness in, evaluations and corrective actions. Metrics include evaluation quality and timeliness, rework, corrective action burn-down curve, and effectiveness of corrective actions to prevent recurrence. The metrics are reviewed monthly at the Management Review Meeting. This action has been completed. (Reference CR 34455)
5. Challenge boards implemented in 2010 continue to be utilized. An interim effectiveness review completed on August 30, 2011, indicates challenge boards for operability evaluations; root, apparent and basic cause evaluations; and basic engineering dispositions are effective in improving product quality. Condition reports are initiated for evaluation deficiencies and challenge board performance is reviewed at the monthly Management Review Meeting. This action is ongoing. (Reference CR 23032)
6. The Operational Focus Plan has been revised to build upon the station's ongoing improvement effort. Some key elements of the plan are management and leadership behaviors, process improvements and performance monitoring. For behaviors, senior station management is conducting "Town Hall Meetings" with station personnel to align management and leadership behaviors, individual roles and responsibilities. For process improvements, organizational teamwork is being strengthened to resolve deficiencies that challenge the operator's ability to monitor and safely control the plant. The top equipment issues process is being updated to resolve longer-term projects needed to improve system health and overall station safety performance. The actions discussed above are scheduled for completion on October 30, 2011. (Reference CR 23032)
7. The Corrective Action Review Board (CARB) has been realigned. Select line station managers are now assigned as standing CARB members. This allows a more diverse set of members for CARB and additional oversight and mentoring opportunities for upper management. This action has been completed. (Reference CR 34886)
8. A Culpability Matrix has been incorporated in procedure AI 13E-015, "Wolf Creek Leadership and Accountability Model." The purpose of this procedure is to describe WCNOC's leadership and accountability models as they provide the foundation for leadership development, and initial and continuing leadership training. WCNOC's leadership model is based on reinforcing energetic behaviors where information is exchanged, encouraging rigorous analysis, and open participation at all levels. Training on this procedure and the culpability matrix has been included in Wolf Creek's Leadership Continuing Training program. This action is complete. (Reference CR 34886)

The Table lists each action, along with progress to date, and scheduled completion date.

Action	Progress to Date	Scheduled Completion Date
Management Alignment	As of the end of September 100% of the interviews are scheduled and 70% are complete. Project completion is scheduled for the end of October.	November 15, 2011
Safety Culture Training	Initial training completed for employees in 2010. Refresher training in progress.	Ongoing
CAP Backlog Reduction	Goal of 75% reduction established with burn down curves established by department.	December 15, 2011
CAP Metrics	Metrics emphasizing timeliness and quality of evaluations and corrective actions created.	Complete
Challenge Boards	Interim effectiveness review shows improved quality.	Ongoing
Operational Focus	Town Hall meetings conducted with most work groups to explain the purpose and goals of the Operational Focus Plan.	October 30, 2011
CARB Realignment	Membership has been changed to drive ownership deeper into the organization.	Complete
Culpability Matrix	Procedure issued. Training on this procedure has been included in Wolf Creek's Leadership Continuing Training program.	Complete