

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Nuclear Operations

March 30, 1990

NO 90-0096

U. S. Nuclear Regulatory Commission
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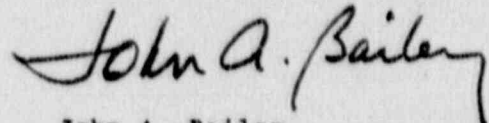
Reference: Letter dated March 1, 1990, "Notification of Intent to Respond to Generic Letter 90-01"
Subject: Docket No. 50-482: Response to Generic Letter 90-01, "Request for Voluntary Participation in NRC Regulatory Impact Survey"

Gentlemen:

The purpose of this letter is to transmit Wolf Creek Nuclear Operating Corporation's (WCNOC) response to Generic Letter 90-01, "Request for Voluntary Participation in NRC Regulatory Impact Survey." The reference letter stated that a response to Generic Letter 90-01 would be made by March 30, 1990.

If you have any questions concerning this matter, please contact me or H. K. Chernoff of my staff.

Very truly yours,



John A. Bailey
Vice President
Nuclear Operations

JAB/jad

Attachment

cc: R. D. Martin (NRC), w/a
D. Persinko (NRC), w/a
D. V. Pickett (NRC), w/a
M. E. Skow (NRC), w/a

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

NRC Team Inspections

2. Based on actual experience over the past several years, about how often is this activity conducted?

Five NRC Team Inspections in the past two years.

3. Operations/Construction areas covered:

N/A

4. Extent of the activity (how many people, for how long):

NRC Team Inspections usually consist of five inspectors on site for a total of 225 man days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

(Answers given in man-hours per year)

- | | |
|--|-----------------------------|
| a. Plant Department Heads <u>600</u> | (number involved) <u>15</u> |
| b. Plant Manager <u>28</u> | |
| c. Corporate Department Heads <u>*</u> | (number involved) <u>*</u> |
| d. Corporate Vice Presidents <u>60</u> | (number involved) <u>3</u> |
| e. Chief Nuclear Officer <u>12</u> | |

* Incorporated into 5a "Plant Department Heads"

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

NRC Resident/Regional Inspections

2. Based on actual experience over the past several years, about how often is this activity conducted?

Sixty-five inspections over the past 2 years.

3. Operations/Construction areas covered:

N/A

4. Extent of the activity (how many people, for how long):

Regional inspections usually consist of one or two inspectors on site for a total of ten man days. Resident inspections consist of two inspectors on site for a total of forty man-days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

(Answers given in man-hours per year)

- | | | | |
|-------------------------------|-------------|-------------------|-----------|
| a. Plant Department Heads | <u>4800</u> | (number involved) | <u>15</u> |
| b. Plant Manager | <u>224</u> | | |
| c. Corporate Department Heads | <u>*</u> | (number involved) | <u>*</u> |
| d. Corporate Vice Presidents | <u>480</u> | (number involved) | <u>3</u> |
| e. Chief Nuclear Officer | <u>96</u> | | |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

INPO

2. Based on actual experience over the past several years, about how often is this activity conducted?

One INPO evaluation per year.

3. Operations/Construction areas covered:

N/A

4. Extent of the activity (how many people, for how long):

INPO evaluations consist of 12-15 persons on site for a total of 120-150 man days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

(Answers given in man-hours per year)

- | | | | |
|-------------------------------|------------|-------------------|-----------|
| a. Plant Department Heads | <u>104</u> | (number involved) | <u>13</u> |
| b. Plant Manager | <u>7</u> | | |
| c. Corporate Department Heads | <u>*</u> | (number involved) | <u>*</u> |
| d. Corporate Vice Presidents | <u>12</u> | (number involved) | <u>3</u> |
| e. Chief Nuclear Officer | <u>2</u> | | |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

Insurers

2. Based on actual experience over the past several years, about how often is this activity conducted?

Three Insurer's inspections per year.

3. Operations/Construction areas covered:

Fire protection, liability, ANI audit

4. Extent of the activity (how many people, for how long):

Insurer's inspections consist of two inspectors on site for a total of two man-days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

(Answers given in man-hours per year)

- | | | | |
|-------------------------------|------------|-------------------|-----------|
| a. Plant Department Heads | <u>39</u> | (number involved) | <u>13</u> |
| b. Plant Manager | <u>6</u> | | |
| c. Corporate Department Heads | <u>*</u> | (number involved) | <u>*</u> |
| d. Corporate Vice Presidents | <u>9</u> | (number involved) | <u>3</u> |
| e. Chief Nuclear Officer | <u>1.5</u> | | |

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NEC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

EPA

2. Based on actual experience over the past several years, about how often is this activity conducted?

One EPA inspection every four years.

3. Operations/Construction areas covered:

Chemistry lab controls

4. Extent of the activity (how many people, for how long):

EPA inspections consist of one person on site for one man-day.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

(Answers given in man-hours per year)

- | | | | |
|-------------------------------|-----------|-------------------|-------------|
| a. Plant Department Heads | <u>10</u> | (number involved) | <u>1</u> |
| b. Plant Manager | <u>0</u> | | |
| c. Corporate Department Heads | <u>*</u> | (number involved) | <u>*</u> |
| d. Corporate Vice Presidents | <u>0</u> | (number involved) | <u> </u> |
| e. Chief Nuclear Officer | <u>0</u> | | |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

OSHA

2. Based on actual experience over the past several years, about how often is this activity conducted?

Two OSHA plant visits in the past two years.

3. Operations/Construction areas covered:

One visit inspected the cause of death of an employee and the other visit inspected safety related working conditions.

4. Extent of the activity (how many people, for how long):

OSHA plant visits consist of four persons on site for a total of eight man-days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

(Answers given in man-hours per year)

- | | | | |
|-------------------------------|--------------|-------------------|--------------|
| a. Plant Department Heads | <u> 8 </u> | (number involved) | <u> 4 </u> |
| b. Plant Manager | <u> 0 </u> | | |
| c. Corporate Department Heads | <u> * </u> | (number involved) | <u> * </u> |
| d. Corporate Vice Presidents | <u> 4 </u> | (number involved) | <u> 2 </u> |
| e. Chief Nuclear Officer | <u> 0 </u> | | |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

State/Local - Kansas Department of Health and Environment (KDHE)

2. Based on actual experience over the past several years, about how often is this activity conducted?

Five state/local inspections per year.

3. Operations/Construction areas covered:

NPDES (National Pollutant Discharge Elimination System), site drinking water, air quality monitoring, hazardous waste.

4. Extent of the activity (how many people, for how long):

State/local inspections consist of one person on site for one man-day.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

(Answers given in man-hours per year)

- | | | | |
|-------------------------------|------------|-------------------|----------|
| a. Plant Department Heads | <u>30</u> | (number involved) | <u>2</u> |
| b. Plant Manager | <u>2.5</u> | | |
| c. Corporate Department Heads | <u>*</u> | (number involved) | <u>*</u> |
| d. Corporate Vice Presidents | <u>5</u> | (number involved) | <u>2</u> |
| e. Chief Nuclear Officer | <u>2.5</u> | | |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

NRC Required QA-Audits

2. Based on actual experience over the past several years, about how often is this activity conducted?

Twelve Required QA-Audits per year.

3. Operations/Construction areas covered:

N/A

4. Extent of the activity (how many people, for how long):

Two person QA-Audit Team onsite for a total of forty man-days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

(Answers given in man-hours per year)

- | | | | |
|-------------------------------|-------------|-------------------|------------------|
| a. Plant Department Heads | <u>1328</u> | (number involved) | <u>1-2/audit</u> |
| b. Plant Manager | <u>12</u> | | |
| c. Corporate Department Heads | <u>*</u> | (number involved) | <u>*</u> |
| d. Corporate Vice Presidents | <u>36</u> | (number involved) | <u>3</u> |
| e. Chief Nuclear Officer | <u>12</u> | | |

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