

Robert C. Hagan Vice President Nuclear Assurance

April 8 1993 NA 93-0095

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Mail Station P1-137 Washington, D. C. 20555

Reference: 1) Letter dated September 19, 1991 from A. Bill Beach,

NRC, to B. D. Withers, WCNOC

2) Letter WM 91-0145 dated October 30, 1991 from

B. D. Withers, WCNOC, to NRC

Subject: Docket No. 50-482: Change in Commitment Associated to

Exercise Weakness 482/9113-04

Gentlemen:

This letter provides notification of a change in commitment made by Wolf Creek Nuclear Operating Corporation (WCNOC). This commitment was made in response to Exercise Weakness 482/9119-04 documented in Reference 1.

Exercise Weakness 482/9119-04 concerned examples of poor coordination and control of field monitoring teams. This weakness was the result of only one of four field teams making contact with the plume during a 2-hour period following the onset of the release. This situation, compounded by problems with subsequent control of the team during sampling efforts, resulted in high exposures to the team. Part of the weakness was also attributed to a lack of equipment, in particular self contained breathing apparatus (SCBA).

In the response provided to the weakness (Reference 2), the cause of the weakness was attributed to a lack of procedural guidance. The associated procedures were revised to provide additional guidance. Additionally, WCNOC committed to require field monitoring teams to take SCBAs with them when deployed.

A re-evaluation of this response has determined that the requirement to take SCBAs when deployed is unnecessary and therefore has been deleted. However, to minimize personnel exposure, the field team monitoring guidelines in procedures, EPP 01-1.1, "WCGS Organization," EPP 01-1.2, "Emergency Operation Facility Emergency Organization," and EPP 01-8.2, "Offsite Radiological Monitoring," are being further enhanced to provide for more detailed guidance on definition, timing and location of plume monitoring. These enhancements also include exposure considerations, exposure limits and guidelines, environmental precautions (such as travel detours due to the reservoir and cooling lake), and precautions on the need for and coordination of SCBA use when conditions warrant them. Procedure EPP 01-8.1, "Onsite Radiological Monitoring," is also being enhanced to emphasize exposure control and personnel protection. With these procedural enhancements, the requirement to take SCBAs upon field monitoring team deployment will not be necessary. Procedure EPP 01-8.3 which was originally revised in response to this weakness, has been subsequently incorporated into procedures EPP 01-8.1 and EPP 01-8.2.

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Due to the additional procedural enhancements it has been determined this does not constitute a reduction in a commitment nor a decrease to the effectiveness of the Radiological Emergency Response Plan. This commitment change was discussed with Dr. D. B. Spitzberg of Region IV, NRC. If you have any questions concerning this change in commitment, please contact me at (316) 364-8831 extension 4553 or Mr. Kevin J. Moles at extension 4565. Very truly yours, Robert C. Hagan Vice President Nuclear Assurance cc: W. D. Johnson (NRC) W. D. Reckley (NRC)