

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Neil S. "Buzz" Carns
Chairman, President and
Chief Executive Officer

February 1, 1995

WM 95-0015

U. S. Nuclear Regulatory Commission
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Washington, D. C. 20555

Reference: Letter dated December 30, 1994, from S. J. Collins, NRC,
to N. S. Carns, WCNOG
Subject: Docket No. 50-482: Response to Weakness 482/9417-01

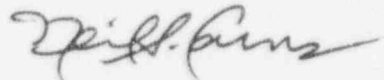
Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) reply to Weakness 9417-01 which was documented in the report of operational status of the emergency preparedness program. Weakness 9417-01 concerned failure of an operating crew to inform plant personnel of necessary protective measures following simulated Site Area and General Emergency classifications.

In addition, based on the results of the inspection, the inspectors concluded that a negative trend exists in operations training regarding applications of the principles of a systems approach to training. Inspection Report 94-17 requested an assessment of the observations related to the systems approach to operations training.

WCNOG's response to this weakness and the request for an assessment are in the attachment to this letter. If you should have any questions regarding this response, please contact me at (316)364-8831, extension 4000, or Mr. R. D. Flannigan at extension 4500.

Very truly yours,



Neil S. Carns

Attachment

NSC/jad

cc: L. J. Callan (NRC), w/a
D. D. Chamberlain (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

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Reply to Weakness 9417-01

Weakness 4B2/9417-01:

Failure of an operating crew during the crew performance walkthrough to inform plant personnel of necessary protective measures following Site Area and General Emergency classifications.

Reason for Weakness:

Procedure EPP 01-1.0, "Control Room Organization," Attachments 3.0 and 4.0, provide a checklist for the Shift Supervisor of actions to be taken when declaring a Site Area Emergency or General Emergency, respectively. These attachments provide specific Gaitronics announcements to inform plant personnel of necessary protective measures. Emergency Planning personnel interviewed the Crew 3 Shift Supervisor concerning the failure to make the Gaitronics announcements following classification of the event at the Site Area Emergency and General Emergency levels. From this interview, it was concluded that the failure to make the required announcements was due to the individual failing to complete the emergency checklist as required, in that the Shift Supervisor overlooked this step in the checklists, which is inattention to detail.

Corrective Actions Taken:

Performance Improvement Request (PIR) 94-2145 was initiated to track the resolution of this weakness. Licensed Operator Requalification Training Cycle 95-1 began January 9, 1995, and concludes February 24, 1995. Within this training cycle, each operating crew participates in a simulator session using a scenario that results in the activation of the Radiological Emergency Response Plan. This scenario results in declaring all emergency classifications on the Gaitronics. Emergency Planning personnel will evaluate each operating crew on making Gaitronics announcements and will participate in the critique following each simulator session. Performance problems with the issuance of Gaitronics announcements will be reviewed with each operating crew during the critique; further training will be conducted as necessary to eliminate this concern. Additionally, the classroom portion of this training cycle will stress that Gaitronics announcements need to be made in a timely manner.

Date When Corrective Actions Will Be Completed:

The above corrective actions will be completed by March 3, 1995.

Assessment of Observations from NRC Inspection Report 94-17

Request:

The cover letter for Inspection Report (IR) 94-17 requested an assessment of NRC observations related to systems approach to operations training in general and the closeout of Violation 9326-01 as summarized below.

Operations personnel errors observed during this and recent inspections point to a common causal factor, a laxness on the part of the Operations Training organization with regard to their evaluation of and response to observed performance of Operations staff. This is indicated by the lack of effectiveness of certain corrective actions committed to in response to a previous violation in the area of emergency classification. In particular, the corrective action related to the role of the Shift Engineer in assisting in the classification process was not effectively demonstrated (page 1 of the cover letter).

Wolf Creek's corrective actions intended to address this continued performance problem were stated by Operations Management and Operations Training personnel as being:

1. Revision of the Emergency Action Levels (EAL) classification procedure to conform to recent industry guidelines.
 2. Management expectation that the Shift Engineer would perform an independent, parallel classification (IR 94-17, page 11).
- A. The inspectors agreed that the revised classification procedure was an improvement over its predecessor. However, the particular error in classification indicated a need to evaluate the training effectiveness in the use of the new procedure (IR 94-17, page 11).
 - B. With respect to the classification role of the Shift Engineer, the inspectors' concerns included: (1) The staff crew Shift Engineer was not aware of the Operations Management expectation; and (2) The communication of the expectation had been handled informally (IR 94-17, page 11).
 - C. The inspectors were also concerned that no formal training objectives had been developed and that no evaluation criteria existed to assess the performance of the Shift Engineer regarding the expectation that parallel classifications be conducted (IR 94-17, page 12).
 - D. The above observations led the inspectors to conclude that Operations Training failed to implement elements of the systems approach to training (SAT) process to ensure the shift engineers could properly perform and remain proficient in EAL classification. The failure related to Elements 2, 3 and 4 (Objective, Design and Implementation, and Trainee Evaluation) (IR 94-17, page 1).
 - E. The inspectors developed a separate concern with regard to the initial licensee response to the observed classification problems observed with

Crew 1. The inspectors confirmed with the training supervisor that both he and the inspectors had observed the same classification problems. The inspectors asked the training supervisor how WCNOG would respond. The training supervisor's reply was that the performance problem demonstrated did not trigger a formal corrective training response. The inspector concluded that this was not responsive to Element 4, "Trainee Evaluation" of the SAT process (IR 94-17, page 12).

F. The inspectors left open Violation 9326-01, failure to correct weaknesses in the area of emergency classification. The following corrective actions related to this open item were not demonstrated as being effective:

- The actions of the Shift Engineer on the two shift crews were not conspicuous enough to determine their impact on the successful classification.
- The staff crew Shift Engineer did not perform an independent classification.

Response:

A. The error in classification by the staff crew was not indicative of a programmatic weakness (IR 94-17, page 8). This is supported by the fact that the Shift Supervisor involved incorrectly assessed a single decision block on the EAL flowchart and consistently repeated the same error (IR 94-17 page 8).

Immediate corrective feedback was given to the Shift Supervisor following the walkthrough (IR 94-17, page 8).

A training effectiveness review regarding Emergency Plan classification was completed in January 1995. Although satisfactory, as an enhancement to strengthen the effectiveness of classification training, additional Emergency Plan classification drills have been added to all 1995 requalification training cycles. The need for additional classification drills in 1996 will be evaluated within the Licensed Operator Requalification Program self assessment. The pass criteria for the additional classification drills has been raised to 100%.

B.-D. The failure to implement the elements of the SAT process was based on a failure to properly identify a training need. To correct the missed identification of training needs, an agenda item will be added to the requalification cycle meetings between Operations and Operations Training to discuss emergent Operations concerns or expectations revealed during the previous cycle. This will provide the opportunity to address these new issues in the upcoming cycles. In addition, expectations for upcoming training cycles will be discussed. This will be implemented at the next requalification cycle meeting which will be conducted no later than March 3, 1995. As such items are identified, they will be formally entered into the SAT process using the request for

training form as described in KGP-1804, "Training Representative Assignment and Responsibilities."

The failure to formally notify Operations Training of the parallel classification management expectation constitutes a failure to implement Element 1, "Analysis," of the SAT process. With that exception, we believe that the remaining elements of the SAT process are functioning properly. A Programmatic Improvement Request (PIR) has been initiated to evaluate the effectiveness of the SAT process as it applies to licensed operator training. In addition, all phases of the SAT process, including the evaluation criteria to assess the Shift Engineer's performance, will be proceduralized no later than March 31, 1995.

A critical self assessment of each Operations Training program will be conducted by the end of 1995 to determine enhancements which can be made to these programs. The format of these self assessments will be similar to that described in ACAD 91-015, "The Objectives and Criteria for Accreditation of Training in the Nuclear Power Industry." These assessments will serve to evaluate the effectiveness of the entire licensed operator training process.

In response to the specific concern regarding the Shift Engineers' ability to properly classify and remain proficient, AP 28-005, "Shift Engineer Duties and Responsibilities," will be revised by March 31, 1995 to include the responsibilities of the Shift Engineer regarding EAL classification. In the interim, the Licensed Senior Reactor Operators and the Shift Engineers are receiving EAL classification training. This training will be completed by February 24, 1995. It has been designed and is being implemented and evaluated in the same manner as is done for the Shift Supervisor, since the task "to classify emergency events" is the same as the Shift Supervisor task.

- E. The separate concern raised by the inspectors demonstrates a lack of a questioning attitude on the part of the training supervisor involved. The responsible supervisor has been counseled in this regard. In addition, the Manager Training has reviewed with all Training Division personnel the need for, and expectation of, a questioning attitude at all times. Management will remain sensitive to this issue and will follow-up as appropriate.
- F. The corrective actions related to Violation 9326-01 were not totally effective in part because of the failure in this instance to implement the Analysis phase (Element 1) of the SAT process. This failure effectively prevented the implementation of the remaining elements of the SAT process. The Operations Manager has made clear to all Shift Engineers the management expectation of parallel classification. This serves as an immediate corrective action until such time as procedure AP 28-005, "Shift Engineer Duties and Responsibilities," is revised (March 31, 1995). This action, along with the specific actions outlined in this response, are expected to correct the weaknesses described in Violation 9326-01.