UNITED STATES



NUCLEAR REGULATORY COMMISSION

REGION IV

611 FIVAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-8064

AUG 30 1995

Wolf Creek Nuclear Operating Corporation ATTN: Neil S. Carns, President and Chief Executive Officer P.O. Box 411 Burlington, Kansas 66839

## SUBJECT: OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGE RELATED TO BIENNIAL REVIEW OF PROCEDURES

We have reviewed the proposed change to the Wolf Creek Nuclear Operating Corporation Operational Quality Assurance program description submitted by your letter ET 95-0059, dated June 28, 1995. We reviewed the proposed change using guidance provided by the Office of Nuclear Reactor Regulation. We have included the guidance as an enclosure to this letter. The proposed change reduces your commitment to conduct a biennial review of plant procedures in accordance with Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, and American National Standards Institute Standard N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."

Your letter stated that the intent of the biennial review of procedures is accomplished by other programmatic controls, which make the biennial review redundant. Attachments I and II of your letter provided a description of the requested change and a description of programmatic controls that already are in place. Attachment I of your letter stated that those controls will accomplish your alternative commitment for biennial procedure review.

Our review has determined that your requested quality assurance program change, as described in your letter ET 95-0059, including Attachments I and II, continues to meet the requirements of 10 CFR 50, Appendix B, and is approved.

Any questions you may have concerning this review should be directed to Mr. W. P. Ang of my staff at (510) 975-0310.

Sincerely. thomas P. Gwynn, Director Division of Reactor Safet

Docket: 50-482 License: NPF-42

Enclosure: Plant Procedure Review Guidance

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cc w/enclosure:

Wolf Creek Nuclear Operating Corp. ATTN: Vice President Plant Operations P.O. Box 411 Burlington, Kansas 66839

Shaw, Pittman, Potts & Trowbridge ATTN: Jay Silberg, Esq. 2300 N Street, NW Washington, D.C. 20037

U.S. Nuclear Regulatory Commission ATTN: Regional Administrator, Region III 801 Warrenville Road Lisle, Illinois 60532-4351

Wolf Creek Nuclear Operating Corp. ATTN: Supervisor Licensing P.O. Box 411 Burlington, Kansas 66839

Wolf Creek Nuclear Operating Corp. ATTN: Supervisor Regulatory Compliance P.O. Box 411 Burlington, Kansas 66839

Missouri Public Service Commission ATTN: Assistant Manager Energy Department P.O. Box 360 Jefferson City, Missouri 65102

Kansas Corporation Commission ATTN: Chief Engineer Utilities Division 1500 SW Arrowhead Rd. Topeka, Kansas 66604-4027

Office of the Governor State of Kansas Topeka, Kansas 66612

Attorney General Judicial Center 301 S.W. 10th 2nd Floor Topeka, Kansas 66612-1597

County Clerk Coffey County Courthouse Burlington, Kansas 66839-1798

Kansas Department of Health and Environment Bureau of Air & Radiation ATTN: Public Health Physicist Division of Environment Forbes Field Building 283 Topeka, Kansas 66620

E-Mail report to D. Sullivan (DJS) E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IE43) - DRS

bcc distrib. by RIV:

L. J. Callan Branch Chief (DRP/B) Section Chief (RIII, DRP/3C) SRI (Callaway, RIII) Project Engineer (DRP/B) Branch Chief (DRP/TSS) Resident Inspector DRSS-FIPB MIS System Leah Tremper (OC/LFDCB, MS: TWFN 9E10) R. Gramm, NRR (OWFN 10A19)

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\*Peer Review

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L. J. Callan Branch Chief (DRP/B) Section Chief (RIII, DRP/3C)

Resident Inspector DRSS-FIPB RIV File SRI (Callaway, RIII)MIS SystemProject Engineer (DRP/B)Leah Tremper (OC/LFDCB, MS: TWFN 9E10)Branch Chief (DRP/TSS)R. Gramm, NRR (OWFN 10A19)

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## ENCLOSURE

## Plant Procedure Review Guidance

- Programmatic controls should specify that all applicable plant procedures will be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system, as specified by Section 5.2 of American National Standards Institute N18.7/American Nuclear Society Standard 3.2 which is endorsed by Regulatory Guide 1.33.
- 2. Non-routine procedures (procedures such as emergency operating procedures, off-normal procedures, procedures which implement the emergency plan, and other procedures whose usage may be dictated by an event) should be reviewed at least every 2 years and revised as appropriate.
- 3. At least every 2 years, the Quality Assurance (or other "independent") organization should audit a representative sample of the routine plant procedures that are used more frequently than every 2 years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.
- Routine plant procedures that have not been used for 2 years should be reviewed before use to determine if changes are necessary or desirable.