



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

August 22, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

KMLNRC 84-149
Re: Docket No. STN 50-482
Ref: KMLNRC 84-076 dated May 8, 1984 from GLKoester,
KG&E, to HRDenton, NRC
Subj: Revision 4 to Wolf Creek Safeguard Contingency Plan

Dear Mr. Denton:

In accordance with the Reference, furnished herewith are six (6) copies of Revision 4 to the WCGS Safeguards Contingency Plan. Attachment 1 describes the reason for each change and why these changes do not decrease the safeguards effectiveness of this plan.

The previously transmitted copies of this plan are superseded in their entirety by the attached copies.

The attached document contains Safeguards Information in accordance with 10CFR73.21 and therefore should be withheld from public disclosure. This letter, when separated from the attachments, does not contain Safeguards Information and should be handled as decontrolled.

Acknowledgement of receipt of this letter would be appreciated.

Yours very truly,

Glenn L. Koester

GLK:bb
Attach
xc: PO'Connor, w/o (2)
HBundy, w/o
SBrown, w/a

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PDR ADOCK 05000482
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OATH OF AFFIRMATION

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

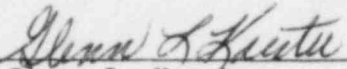
I, Glenn L. Koester, of lawful age, being duly sworn upon oath, do depose, state and affirm that I am Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal, know the contents thereof, and that all statements contained therein are true.

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:



E.D. Prothro, Assistant Secretary

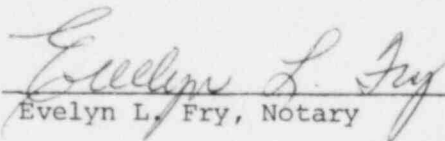
By 

Glenn L. Koester
Vice President - Nuclear

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

BE IT REMEMBERED that on this 22nd day of August, 1984, before me, Evelyn L. Fry, a Notary, personally appeared Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on behalf of and as the act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the date and year above written.



Evelyn L. Fry, Notary



My commission expires on August 15, 1985.

Attachment 1

Many of these changes involve a change in the responsible person who performs a duty or a change in his title. A more detailed description of the changes and their justification is provided below.

Change #	Affected Page/Section	Reason for Change/Justification
1.	1-2/1.3.1	<p><u>Reason for Change</u></p> <p>This situation was omitted from the listing, but discussed in the text.</p> <p><u>Justification</u></p> <p>No program change has been made.</p>
2.	1-3/1.4 2-3/2.1 2-17/2.2.11 2-28/2.2.18 Table 4-1 (Sh 2) Table 4-2 (Sh 2) Table 4-3 (Sh 1) Table 4-18 (Sh 1) Table 4-25 (Sh 1) Table 4-26 (Sh 3) Table 4-28 (Sh 1) Table 4-30	<p><u>Reason for Change</u></p> <p>This change clarifies NRC involvement.</p> <p><u>Justification</u></p> <p>The change reflects the fact that NRC involvement is not limited to Region IV.</p>
3.	1-3/1.4	<p><u>Reason for Change</u></p> <p>The order of succession has been redefined.</p> <p><u>Justification</u></p> <p>The position of Call Supervisor allows for the order of succession to be better defined for all contingencies. A management person is designated 24 hours a day as a successor to the Plant Manager. Note that the Superintendent of Plant Support and Superintendent of Operations can hold the position of Call Supervisor.</p>

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4.	1-4/1.4 3-1/3.1 3-2/3.1.1 3-9/3.4.3 3-10/3.5 All Tables	<p data-bbox="888 321 1219 351"><u>Reason for Change</u></p> <p data-bbox="888 385 1549 506">The titles of Plant Superintendent and Security Shift Supervisor has been changed to Plant Manager and Security Shift Lieutenant.</p> <p data-bbox="888 540 1141 570"><u>Justification</u></p> <p data-bbox="888 604 1587 761">The Plant Manager and Security Shift Lieutenant perform the same security-related duties as the old Plant Superintendent and Security Shift Supervisor, respectively.</p>
5.	1-5/1.5	<p data-bbox="888 832 1219 861"><u>Reason for Change</u></p> <p data-bbox="888 895 1529 995">The Quality Branch has assumed responsibility for review of this plan.</p> <p data-bbox="888 1029 1141 1059"><u>Justification</u></p> <p data-bbox="888 1093 1549 1187">The Quality Branch is considered a more appropriate group to perform reviews and audits.</p>
6.	2-10/2.2.5.3	<p data-bbox="888 1251 1219 1281"><u>Reason for Change</u></p> <p data-bbox="888 1315 1392 1378">The section referenced was incorrect.</p> <p data-bbox="888 1412 1141 1442"><u>Justification</u></p> <p data-bbox="888 1476 1508 1506">No program change has been made.</p>
7.	2-15/2.2.10 2-18/2.2.13	<p data-bbox="888 1576 1219 1606"><u>Reason for Change</u></p> <p data-bbox="888 1640 1571 1704">The event type was omitted from the title.</p> <p data-bbox="888 1738 1141 1768"><u>Justification</u></p> <p data-bbox="888 1802 1508 1836">No program change has been made.</p>

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8.	3-1/3.1 3-2/3.1	<p><u>Reason for Change</u></p> <p>The title Plant Support Supervisor has been changed to Superintendent of Plant Support. His duties have been further defined and the revised order of succession has been incorporated.</p> <p><u>Justification</u></p> <p>The Superintendent of Plant Support performs the same Security-related duties as the old Plant Support Supervisor. The revised order of succession is discussed in Item 3.</p>
9.	3-1/3.1	<p><u>Reason for Change</u></p> <p>The title Operations Supervisor has been changed to Superintendent of Operations. His relationship to the position of Call Superintendent has been added.</p> <p><u>Justification</u></p> <p>The Superintendent of Operations performs the same duties as the old Operations Supervisor with the exception of the order of succession to the Plant Manager (discussed in Item 3). The position of Call Superintendent is discussed in Item 10.</p>
10.	3-2/3.1	<p><u>Reason for Change</u></p> <p>A description of the Call Superintendent position has been added.</p>

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10.		<p><u>Justification</u></p> <p>The creation of the position of Call Superintendent allows the chain of succession to be clearly defined at all times.</p>
11.	3-2/3.1.1	<p><u>Reason for Change</u></p> <p>This change reflects the creation of the Command Sargent position.</p> <p><u>Justification</u></p> <p>The creation of the position of Command Sargent is considered to be an increase in the effectiveness of the plan since he has dedicated responsibility for the response force which frees the SAS operator for other activities.</p>
12.	2-5/2.2.3 2-19/2.2.13.2 3-2/3.1.1 3-3/3.1.1 Table 4-8	<p><u>Reason for Change</u></p> <p>This change corrects a typographical error.</p> <p><u>Justification</u></p> <p>No program change has been made.</p>
13.	2-3/2.2.1 3-4/3.2	<p><u>Reason for Change</u></p> <p>This change corrects minor errors in the text.</p> <p><u>Justification</u></p> <p>No program change has been made.</p>

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14.	3-4/3.2 Figure 3.1-1	<p><u>Reason for Change</u></p> <p>This change incorporates changes submitted in Rev. 3 of the Physical Security Plan.</p> <p><u>Justification</u></p> <p>No program changes have been made.</p>
15.	3-4/3.3.1 3-5/3.3.1	<p><u>Reason for Change</u></p> <p>These changes update the description of the communication system.</p> <p><u>Justification</u></p> <p>The supplier of the telephone system may not be Bell. This should not reduce the effectiveness of the program. Also, the addition of a direct link plant intercom system is considered an addition to the effectiveness of the program.</p>
16.	3-8/3.4.1	<p><u>Reason for Change</u></p> <p>Wolf Creek personnel have been trained to perform this function.</p> <p><u>Justification</u></p> <p>This is considered an upgrade to the effectiveness of the program since response times should improve.</p>
17.	3-11/Chart 3-1	<p><u>Reason for Change</u></p> <p>This change was made to reflect title changes.</p> <p><u>Justification</u></p> <p>The newly titled positions perform the same duties as before.</p>

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18.	3-12/Chart 3-2	<p><u>Reason for Change</u></p> <p>This change reflects a title change and the addition of the position of Command Sargent.</p> <p><u>Justification</u></p> <p>The Security Shift Lieutenant performs the same duties as the old Security Shift Supervisor. The addition of the Command Sargent position allows for dedicated direction to the response force and frees the SAS operator for other activities.</p>
19.	Table 4-1 (Sh 1)	<p><u>Reason for Change</u></p> <p>An administrative procedure has been developed to address this situation.</p> <p><u>Justification</u></p> <p>The procedure provides additional guidance on what action to take in this situation. This change does not decrease the safeguards effectiveness of the program.</p>
20.	All Tables	<p><u>Reason for Changes</u></p> <p>The table has been revised to reflect changes in the information transmittal hierarchy.</p> <p><u>Justification</u></p> <p>These changes ensure that the appropriate security management personnel are aware of potential threats.</p>

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21.	Table 4-1 (Sh 1)	<p><u>Reason for Change</u></p> <p>This change allows bomb disposal personnel to be notified at an earlier point in the event.</p> <p><u>Justification</u></p> <p>Earlier involvement by bomb disposal personnel is considered an increase in the effectiveness of the plan.</p>
22.	Table 4-1 (Sh 2) Table 4-2 (Sh 2) Table 4-18 Table 4-20	<p><u>Reason for Change</u></p> <p>This change was made to eliminate redundant duties and avoid possible confusion over who is responsible for performing a given task.</p> <p><u>Justification</u></p> <p>No change has been made regarding activities performed.</p>
23.	Table 4-1 (Sh 2, 3)	<p><u>Reason for Change</u></p> <p>This change was made to prevent calling in the FBI for a noncredible threat.</p> <p><u>Justification</u></p> <p>The FBI is notified once a threat is determined to be credible. This change is not considered a decrease in the safeguards effectiveness of the plan.</p>
24.	Table 4-1 (Sh 2) Table 4-7	<p><u>Reason for Change</u></p> <p>This change assures that operational considerations are provided to the Plant Manager.</p>

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24.		<p><u>Justification</u></p> <p>The change provides additional information to the Plant Manager.</p>
25.	Table 4-6 Table 4-7 Table 4-10 Table 4-15 (Sh 1) Table 4-23 (Sh 1) Table 4-24 (Sh 2) Table 4-25 Table 4-30	<p><u>Reason for Change</u></p> <p>This change clarifies the SSL's duties.</p> <p><u>Justification</u></p> <p>The change provides additional guidance and does not reduce any of the previous duties assigned to the SSL.</p>
26.	Table 4-12 (Sh 2)	<p><u>Reason for Change</u></p> <p>This change makes sure that the appropriate security personnel are aware of termination of the Event.</p> <p><u>Justification</u></p> <p>The change does not decrease the safeguards effectiveness of the plan since it involves assuring that appropriate security personnel are notified when the Event ends.</p>
27.	Table 4-13 (Sh 1)	<p><u>Reason for Change</u></p> <p>This change clarifies that the SSL and other security force members may be directed to provide assistance in this Event.</p> <p><u>Justification</u></p> <p>No program change has been made.</p>

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28.	Table 4-14	<p data-bbox="888 285 1219 314"><u>Reason for Change</u></p> <p data-bbox="888 344 1595 438">This change was made to allow the SS to direct this Event. Certain duties have been reassigned.</p> <p data-bbox="888 472 1146 502"><u>Justification</u></p> <p data-bbox="888 536 1513 697">No deletions have been made regarding what duties will be performed. Therefore, the safeguards effectiveness of this plan has not been decreased.</p>
29.	Table 4-14 (Sh 1)	<p data-bbox="888 761 1219 791"><u>Reason for Change</u></p> <p data-bbox="888 825 1595 919">The change was made to clarify action to be taken if disturbance is uncontrollable.</p> <p data-bbox="888 953 1146 983"><u>Justification</u></p> <p data-bbox="888 1017 1513 1046">No program change has been made.</p>
30.	Table 4-15 (Sh 1)	<p data-bbox="888 1119 1219 1149"><u>Reason for Change</u></p> <p data-bbox="888 1183 1536 1242">This change clarifies the Control Room's role in this Event.</p> <p data-bbox="888 1276 1146 1306"><u>Justification</u></p> <p data-bbox="888 1340 1595 1532">This is not considered a decrease in the safeguards effectiveness of this plan since it does not reduce the duties performed, but instead clarifies the Control Room's responsibilities.</p>
31.	Table 4-19 (Sh 1)	<p data-bbox="888 1604 1219 1634"><u>Reason for Change</u></p> <p data-bbox="888 1668 1562 1796">These changes were made 1) to clarify what is meant by increased security force alertness and 2) to delete notification of the CAS.</p>

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31.		<u>Justification</u> 1) No program change was made. 2) The CAS had no assigned duties in this event.
32.	Table 4-22 (Sh 1)	<u>Reason for Change</u> The text was redundant. The SS increased the guard patrols and surveillance prior to this event. <u>Justification</u> The Security Force was increased at an earlier point in this event.
33.	Table 4-24 (Sh 1)	<u>Reason for Change</u> The change allows the SS to take the lead in this event until the event is determined to be of a serious nature. When the Event is determined to be serious the Plant Manager takes over. <u>Justification</u> This change frees the Plant Manager to attend to other duties unless a serious threat exists.
34.	Table 4-25 (Sh 1)	<u>Reason for Change</u> This change allows LLEA's to be informed earlier for onsite situations. <u>Justification</u> This is considered an increase in the effectiveness of the plan.

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35.	Table 4-25	<p><u>Reason for Change</u></p> <p>These changes address the possibility of a Security Emergency being declared for this Event.</p> <p><u>Justification</u></p> <p>This change provides additional guidance for this Event.</p>
36.	Table 4-26 (Sh 1) Table 4-27 (Sh 1)	<p><u>Reason for Change</u></p> <p>This change clarifies the security level of this Event.</p> <p><u>Justification</u></p> <p>This change provides additional guidance for this Event.</p>
37.	Table 4-26 (Sh 2)	<p><u>Reason for Change</u></p> <p>Additional guidance has been added for this Event.</p> <p><u>Justification</u></p> <p>This is considered an increase in the effectiveness of this plan.</p>
38.	Table 4-29	<p><u>Reason for Change</u></p> <p>This change clarifies the SAS operators duties and revises the individual responsible for activating call-in.</p> <p><u>Justification</u></p> <p>No decrease in the function performed has occurred.</p>

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