

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

August 21, 1992

Bart D. Withers  
President and  
Chief Executive Officer

WM 92-0135

U. S. Nuclear Regulatory Commission  
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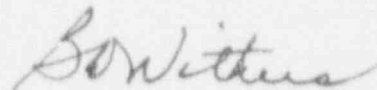
Reference: Letter dated July 20, 1992 from A. B. Beach, NRC to  
B. D. Withers, WCNOG  
Subject: Pocket No. 50-482: Response to Weaknesses 482/9213-01,  
482/9213-02 and 482/9213-03

Gentlemen:

This letter provides Wolf Creek Nuclear Operating Corporation's response to Weaknesses 482/9213-01, 482/9213-02 and 482/9213-03 as a result of an inspection of the operational status of the emergency preparedness program and dose calculation and assessment. Weakness 482/9213-01 involved emergency classification of accident conditions by operating crews. Weakness 9213-02 consisted of several examples of errors and omissions in notification messages and in the formulation and issuance of protective action recommendations. Weakness 482/9213-03 identified the failure of the dose assessment procedure to provide guidance on obtaining accurate integrated dose projections based on prior release conditions.

If you have any questions concerning this matter, please contact me or Mr. Kevin J. Moles of my staff.

Very truly yours,



Bart D. Withers  
President and  
Chief Executive Officer

EDW/jra

Attachment

cc: A. T. Howell (NRC), w/a  
J. L. Milhoan (NRC), w/a  
G. A. Pick (NRC), w/a  
W. D. Reckley (NRC), w/a  
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Weakness (482/9213-01): Emergency Classification of Accident Conditions

The inspector observed and evaluated the ability of each crew to detect, assess, and classify abnormal and accident conditions. Two out of three crews failed to recognize that emergency action level initiating conditions had been met for a scenario event. Consequently, the two shift supervisors did not declare a Site Area Emergency when they became aware of plant conditions indicating a breach of, or challenge to the integrity of two fission product barriers. Specifically, fuel cladding was challenged as the result of an anticipated transient without trip, and containment was breached because of a steam generator atmospheric relief valve that was stuck open and unisolable. These conditions met the emergency action level for a Site Area Emergency contained in EPP 01-2.1, "Emergency Classification."

Analysis:

During interviews with operators it was evident that Emergency Plan Procedure, EPP 01-2.1, "Emergency Classification" phraseology led to the weakness. The wording in Step 3.6.3 of procedure EPP 01-2.1 can lead to confusion in classifying a containment breach when coupled with another fission product barrier breach.

Corrective Actions:

Procedure EPP 01-2.1 will be revised to clarify Step 3.6.3. A course titled, "Emergency Plan Practical" will be retaught during the current operator requalification training cycle. Classifications made during the requalification training by each operating crew will also be reviewed.

Date When Corrective Action Will Be Completed:

Procedure EPP 01-2.1 will be revised by October 30, 1992 and issued within 30 days of NRC approval. The current operator requalification training cycle will be completed September 11, 1992. Review and critique of classifications made by operating crews are conducted after each session on the simulator and will also be completed by September 11, 1992.

Weakness (482/9213-02): Notifications and Protective Action Recommendations Made to Offsite Authorities

Errors and omissions in notification messages and in the formulation and issuance of protective action recommendations were identified during the walkthroughs as evidenced by several observations.

Analysis:

Only the classification section of Part A from the Immediate Notification Form is reviewed during Operator Requalification Examinations. Therefore, only this section has been emphasized during training. This has resulted in inexperience in completing the entire notification form.

Corrective Actions:

Simulator training scenarios will be reviewed to ensure they contain sufficient detail for the instructor to evaluate if the Immediate Notification Form has been completed correctly. During all future simulator sessions, with the exception of practice examinations and requalification examinations, all of Part A of the Immediate Notification Form will be completed by the Shift Supervisor. The form will be evaluated with the Shift Supervisor as part of the critique session. Annually, Emergency Plan personnel or Training personnel, will monitor each crew for proper form completion.

Date When Corrective Actions Will Be Completed:

In order to allow several opportunities for each crew to be on the simulator, corrective actions will be completed by March 31, 1993.

Weakness (482/9213-03): Failure of the Dose Assessment Procedure to Provide Guidance on Obtaining Accurate Integrated Dose Projections Based on Prior Release Conditions

One crew was unable to obtain an accurate estimate of the offsite radiological consequences of the release, because the dose assessment procedure did not provide guidance for initiating a dose projection after initial release conditions had changed significantly. In this case, the chemistry technician had been dispatched from the control room by the emergency director prior to the release to obtain steam generator samples. When he returned, the release had been in progress for approximately 20 minutes. The chemistry technician then promptly calculated the initial post-release dose projections in accordance with EPP 01-7.2 but used real time flow data from the release source. At the time, however, the flow had decreased about 70 percent since the onset of the release because of depressurization. Therefore, this dose projection did not provide an accurate assessment of the consequences of the release from the time it began.

Analysis:

A review of this weakness determined that procedure EPP 01-7.2, "Computer Dose Calculations," does not provide guidance to obtain the highest flow or release rates from the beginning of a release.

Corrective Actions:

Procedure EPP 01-7.2 will be revised to provide more complete guidance. Training for personnel performing dose calculations will be provided following issuance of procedure EPP 01-7.2. All other dose assessment personnel will complete required reading on procedure EPP 01-7.2. Chemistry personnel continue to train on the simulator with the operating crews to provide them with control room experience.

Date When Corrective Actions Will Be Completed:

Procedure EPP 01-7.2 will be revised and issued by October 30, 1992. Required reading will be completed within 60 days of issuance of the required reading notice. Training for personnel performing dose assessment will be completed by March 31, 1993.