

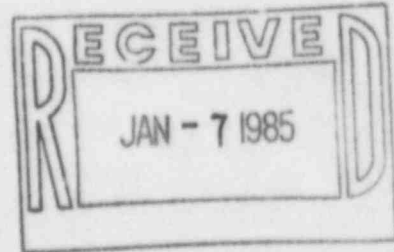


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

January 4, 1985

Mr. R.P. Denise, Director
Wolf Creek Task Force
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 85-008
Re: Docket No. STN 50-482
Ref: Emergency Preparedness Appraisal
Report (50-482/84-25)
Subj: KG&E's Schedule and Cross-Reference for
Appendix A "Significant Preparedness
Deficiencies"

Dear Mr. Denise:

As requested in the Referenced report, we have attached a schedule for correcting the deficiencies noted in Appendix A.

Kansas Gas and Electric Company feels that Item 482/8425-58 is adequately covered by existing procedures and no further action is planned. A detailed discussion is provided in the attachment.

A subsequent letter addressing Appendix B, "Preparedness Improvement Items" of the Referenced report will be forthcoming.

Yours very truly,

Glenn L. Koester

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

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Schedule for Completion and Cross-Reference for NRC Emergency
Preparedness Appraisal (50-482/84-25) Appendix A Deficiencies

1. KG&E Emergency Organization
 - a. Establish a procedure for assignment of individuals to positions in the emergency organization. (482/8425-01)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 02-1.2, Revision 1, Attachment 4.0
B. ERO Duty Roster
C. ERO Position Acknowledgement Forms
 - b. Revise the EPIP, EPP 01-1.1, Revision 0, and EPP 01-1.2, Revision 0, to be consistent with the Plan and incorporate the guidance of NUREG-0654 concerning authorities and responsibilities which cannot be delegated; revise the Plan and EPIP's as necessary to insure consistency between the two in the duties and responsibilities of key personnel in the emergency response organization. (482/8425-02)

Response: In Progress

Scheduled Completion Date: 1/15/85

Reference: A. EPP 01-1.1, Revision 2
B. EPP 01-1.2, Revision 2
C. WCGS Radiological Emergency Response Plan, Revision 15, Section 1
 - c. Revise the Plan to reflect which organization is responsible for and which organization(s) conduct emergency plan training for emergency response personnel. (482/8425-03)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 02-1.2, Rev. 1, Section 4.1
B. Emergency Plan Section 5.1-1
 - d. Develop and implement an emergency response personnel call out program for normal, off-normal, and holiday hours; e.g., home office, general office, and plant staff. (482/8425-50)

Response: Procedures have been developed to delineate the responsibility and guidelines for the ERO callout program there procedures are presently undergoing review and PSRC approval.

Scheduled Completion Date: 1/10/35

Reference: A. EPP 01-3.4, Rev. 0
B. EPP 01-3.5, Rev. 0
C. EPP 01-3.6, Rev. 0

- e. Complete distribution of tone alert radios. (482/8425-51)

Response: Completed

Scheduled Completion Date: N/A

Reference: KG&E file memo, KSLKS 85-002

- f. Prior to receipt of a license to load the core, recycle all licensed operators through emergency classification training. (482/8425-90)

Response: Completed

Scheduled Completion Date: N/A

Reference: WCGS Emergency Plan Training Records

2. Onsite/Offsite Radiological Monitoring

- a. Make provisions for a vehicle for each offsite radiological monitoring team which is adequate for their needs and develop, and implement procedures and provisions for offsite radiological monitoring teams acquiring and utilizing a vehicle. (482/8425-44)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 02-1.5, Rev. 1

- b. Complete and revise EPP 01-7.1, EPP 01-7.2, and EPP 01-7.3 to describe the RRIS and adequately cross-reference these procedures and the calculations, parameters and variables. Identify the procedure and page reference for calculating or obtaining applicable parameter or variable included in a calculation if the parameter or variable value is not presented in the attachment. (482/8425-54)

Response: A procedure change has been generated to include cross-referencing between EPP 01-7.2 and EPP 01-7.3.

Scheduled Completion Date: 1/15/85

Reference: A. EPP 01-7.2, Rev. 2
B. EPP 01-7.3, Rev. 2

- c. Modify and revise the calculation method procedure for manual dose projection and revise the associated documentation in procedure EPP 01-7.3 to address and correct the potential for inaccurate, integrated and projected integrated dose calculations. (482/8425-55)

Response: A procedure change to EPP 01-7.3 has been generated to clarify the use of the calculator for manual dose calculations. A benchmark case is being added to test calculator operability.

Scheduled Completion Date: 1/15/85

Reference: A. EPP 01-7.3, Revision 2

- d. Revise procedures EPP 01-7.2 and EPP 01-7.3 to provide a means to calculate the radiological release of radioactivity from the steam drive auxiliary feedwater pump vent. (482/8425-56)

Response: Complete

Scheduled Completion Date: N/A

Reference: A. EPP 01-7.3, Page 14, Rev. 2
B. EPP 01-7.2, Page 8, Rev. 2

3. Personnel Accountability

- a. Establish a capability to control personnel access to the protected areas at an alternate location in the event that evacuation of the PACS evacuation is necessary. (482/8425-71)

Response: A procedure change has been generated to reference the WCGS Security Plans and procedures which identifies alternate PACS methodologies.

Scheduled Completion Date: 1/15/85

Reference: A. WCGS Security Plan
B. EPP 01-6.1, Revision 2

- b. Provide an alternate personnel accountability station for non-essential workers required to evacuate during a full-scale exclusion area evacuation in the event that PACS evacuation is necessary. (482/8425-72)

Response: Procedure changes have been generated in EPP 01-6.1 identifying the Ed Center/EOF parking lot as the alternate personnel accountability station.

Scheduled Completion Date: 1/15/85

Reference: A. WCGS Security Plan
B. EPP 06-6.1, Rev. 2

4. Public Education and Information

- a. Revise the Plan to describe the actual public information program in existence. Consistency should be maintained between the Plan and EPIPs. (482/8425-05)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. WCGS Radiological Emergency Response Plan,
Section 5.4, Rev. 15
B. EPP 02-1.4, Rev. 0

- b. Distribute the public information brochure and other emergency informational material to residents and the transient population with the 10-mile EPZ and include the toll free rumor control number in the brochure. (482/8425-32)

Response: Completed

Scheduled Completion Date: N/A

Reference: Public Information Booklet

- c. Demonstrate full augmentation by conducting an unannounced, off hours augmentation of the emergency organization, to include control room, TSC, EOF and OSC prior to exceeding 5 percent full power. (482/8425-52)

Response: Procedures have been developed that identify the KG&E Emergency Response Organization callout. A drills program and schedule is currently under development to implement this program.

Scheduled Completion Date: 3/15/85

Reference: A. EPP 01-3.4, Rev. 0
B. EPP 01-3.5, Rev. 0
C. EPP 01-3.6, Rev. 0
D. Emergency Phone Directory

- d. Install the prompt public notification system, develop and implement a surveillance program for siren and tone alert radio maintenance. (482/8425-53)

Response: A procedure which describes siren maintenance has been generated. A program to schedule siren and tone alert maintenance is being developed.

Scheduled Completion Date: 1/15/85

Reference: A. EPP 02-1.8, Rev. 0
B. Emergency Planning Surveillance Schedule
Rev. 0.

- e. Disseminate the telephone directory information to members of the general public in the EPZ. (482/8425-88)

Response: Completed

Scheduled Completion Date: N/A

Reference: Burlington Kansas Phone Book, Page 23, 24

- f. Implement an annual media seminar (initiate prior to fuel load) program in accordance with Section 5.4.1 of the Plan. (482/8425-89)

Response: The media seminar was implemented on 10/24/84 and will be scheduled annually.

Scheduled Completion Date: N/A

Reference: Media Training Package

5. Corporate and Site Emergency Plan and Procedures

- a. Revise the Plan to describe or reference the actual training programs in existence. Consistency should be maintained between the Plan and EIPs. (432/8425-04)

Response: Completed

Scheduled Completion Date: N/A

Reference: WCGS Radiological Emergency Response Plan, Section 5.1, Revision 15.

- b. Revise the lesson plan for Module 4 to reflect that the ENS phone is connected to the NRC Headquarters Operations Centers, Bethesda, Maryland, rather than Region III, Glen Ellyn, Illinois. (432/8425-08)

Response: Completed

Scheduled Completion Date: N/A

Reference: Module 4, "Communication," Revision 1.

- c. Revise the lesson plan for EAL/Protective Action Recommendation to reflect the correct meaning of EAL as indicated in 10 CFR 50, Appendix E, paragraph IV.C. (432/8425-09)

Response: Completed

Scheduled Completion Date: N/A

Reference: Emergency Classification/PAR Lesson Plan EPAA-23000, Revision 1.

- d. Formally promulgate selection criteria for assignment of personnel to emergency response positions and complete personnel training. (432/8425-10)

Response: Completed SQC For 15 Primary ERO Members

<u>TSC</u>	<u>EOF</u>	<u>OSC</u>
1. DED	1. DEM	1. OSC SUP
2. OEC	2. RAM	2. OSTD
3. REC	3. ARM	
4. AEC	4. TRM	
5. MEC	5. RAS	
6. RAC	6. DAS	
7. DAC		

Subsequent ERO Personnel to be completed post Emergency Preparedness Task Analysis and Training Program Revision.

Scheduled Completion Date: 6/15/85

Reference: A. EPP02-1.2 Attachment 3.0 Revision 2.

- e. Train emergency response personnel in station recall procedures when equipment is in place and a program is implemented. (482/8425-11)

Response: Procedures have been written and are in the review cycle. Training will be accomplished via KG&E required reading.

Scheduled Completion Date: 1/10/85

Reference: A. EPP 01-3.4, Revision 0
B. EPP 01-3.5, Revision 0
C. EPP 01-3.6, Revision 0

- f. Modify paragraph 7 of attachment 1 to EPP 01-10.1 to ensure no recommendation discontinuity exists in the case of subzones which overlap the 5 mile radius. Review the apparent conflict between EPP 01-10.1, paragraph 5.1.3.1 and paragraphs 1.4.1.1.1 and 1.,4.1.2 of the Plan concerning authority and responsibility for recommendations and evacuations; promulgate necessary revisions. (482/8425-12)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 01-10.1, Revision 1, Attachment 1

- g. Provide controlled copies (rather than information copies) of the Plan and the EPIPs; revise the ADM procedures to delete reference to the ADM 12 Series procedures and to reflect the existence of the EPP family of procedures. (482/8425-18)

Response: Completed

Scheduled Completion Date: N/A

Reference: Deletion Notices for ADM Series 12-1.0 through 12-19.1.

- h. Identify the backup OSC in the Plan and procedures and develop, and implement relocation procedures for transfer of essential documents, equipment, and personnel from the OSC to backup OSC. Provide training for emergency response team personnel in this area. (482/8425-22)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP-4.2, Revision 1, Section 4.1.1
B. EPP-4.2, Revision 1, Section 4.4.6, Attachment 7.0
C. EPP-4.2, Revision 1, Section 4.4.11
Training and drill records

- i. Complete revisions to the Plan and EIPs to eliminate inconsistencies and meet the applicable requirements of 10 CFR 50. (482/8425-48)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. WCGS Radiological Emergency Response Plan, Revision 15
B. EPP's (Revision 0, 1, & 2)

- j. Revise the Emergency Operating Procedures Manual to reference EPP series procedures. (482/8425-45)

Response: A review of all applicable EMGs is currently underway to identify accident sequences where references to the EPPs is necessary. The EMGs will be revised as required.

Scheduled Completion Date: 3/1/35

Reference: N/A

- k. Provide in EPP 01-10.1 a flow chart for general emergency decision-making which reflects the emergency action level barrier (flow chart) criteria classification scheme. (482/8425-57)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 01-10.1, Revision 1, Attachment 1.

- l. Develop and implement a procedure which directs the individual responsible for radiological assessment. This procedure should specify sources of information for radiological assessment. (482/8425-58)

Response: Several EPP procedures describe actions required for radiological assessment. These procedures describe onsite and offsite radiological assessment in terms of inplant monitoring, onsite surveys, offsite monitoring, dose calculations, release rate determination, and Protective Action Recommendations. Organizational and facility related procedures provide task guidance and check lists for performing radiological assessment functions. Eventually all members of the Emergency Response Organization will be trained and drilled to demonstrate their proficiency in this area. No action necessary.

Scheduled Completion Date: N/A

Reference: EPP01-1.1 EPP01-7.1 EPP01-10.1
EPP01-1.2 EPP01-7.2
EPP01-4.1 EPP01-7.3
EPP01-4.2 EPP01-8.1
EPP01-4.3 EPP01-8.2

- m. Develop and implement procedures to maintain and verify the readiness of the facility public address system, such that all personnel within the owner controlled area can be given verbal instructions as reflected in the Plan and procedures. (482/8425-65)

Response: Completed

Scheduled Completion Date: N/A

Reference: KG&E letter OPS - ZM51 (Zell to Shift Supervisor).

- n. Develop and implement an independent, emergency program review to meet the requirements in 10 CFR 50.54(t) and NUREG-0654, II.P.9. (482/8425-86)

Response: Completed

Scheduled Completion Date: N/A

Reference: Special Scope Quality Requirements
Emergency Planning Program Schedule
General Procedure KGP-1200

- o. Develop and implement procedures, conduct training, and complete equipment inventories for all offsite support agencies, including radiological monitoring devices and protective equipment. (482/8425-37)

Response: Completed

Scheduled Completion Date: N/A

Reference: State and County Plans

- p. Revise EPP 01-10.1 to conform to the guidance of NRC I&E Information Notice 83-28; verify population data displayed by subzone in the same procedure. (482/8425-91)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 01-10.1, Attachment 1.0, Revision 1

6. Communications

- a. Implement procedures for periodic inspection checks of emergency communications equipment. Locate all onsite and offsite emergency communications equipment as specified in the emergency plan. (482/8425-37)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 02-1.6 Revision 0

- b. Define audible alarm signals for emergency alarms and provide training for all exclusion area and site personnel. (482/8425-38)

Response: Completed

Scheduled Completion Date: N/A

Reference: WCGS Emergency Alarm Signal Memo
WCGS General Employee Training

- c. Install and verify the NRC F&S and the NRC HPN. (482/8425-39)

Response: The ENS System Installation is underway. The HPN System Installation requires no KG&E action at this time.

Scheduled Completion Date: Tentatively 1/17/85

Reference: KG&E Memo A. Montague to R. Hoyt.

7. Emergency Response Facilities

- a. Complete the installation, testing, and turnover of equipment in the mechanical room including the general atomics radiological air monitor and the high efficiency air filters. Install a remote air monitor and the high efficiency air filters. Install a remote air monitor alarm within the habitable TSC spaces. Inspect and repair TSC exterior doors and door gaskets. (482/8425-16)

Response: Work is presently underway to complete all turnover and testing work in the TSC. A work request was submitted to replace door gasketing on TSC doors.

Scheduled Completion Date: 3/1/85

Reference: WCGS I & C Shop calibration and testing schedule.

- b. Provide for particulate air monitoring of the TSC atmosphere by either a procedural requirement for periodic portable sampling, or alternately, use of the particulate monitoring capability of the general atomics unit. (482/8425-17)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 01-4.1, Revision 1
B. HPH 03-003

- c. Establish in procedures the limits for direct radiation and radiological airborne contaminants which would necessitate evacuation of the OSC. (482/8425-21)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 01-4.2, Revision 1.0, Section 4.4.11

- u. Revise EPP 01-4.2 to include provisions for periodic monitoring of the habitability of the OSC. This duty should be identified as a responsibility of the OSTD in EPP 01-1.1. (482/8425-23)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 01-4.2, Section 4.4.9, Revision 1
B. EPP 01-4.2, Section 4.4.9.1, Revision 1
C. EPP 01-1.1, Section 4.23.7, Revision 1

- e. Complete the installation and turnover of the general atomics air monitor; establish a method for periodic monitoring of EOF atmosphere for air activity. Provide TLDs and pocket dosimeters for all EOF staff. (482/8425-26)

Response: Work is underway on testing and turnover of the general atomics air monitor. Other areas of this item are completed.

Scheduled Completion Date: 3/1/85

Reference: A. EPP 01-4.3, Revision 1

- f. Complete the status board installation as described above; replace missing emergency kit seals; remove the cancelled ADM 12 Series procedures volume from the EOF; complete outfitting of the EOF microfiche library. Repair the door closure device on the exterior door facing the B building. (482/8425-27)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. Deletions sheets ADM 12-1.0-12-19.1
B. WCGS master micro-fische library document control listing.

- g. Revise the Plan, Section 4.1.2.2 to reflect the actual location of the MRC. (482/8425-33)

Response: Completed

Scheduled Completion Date: N/A

Reference: Emergency Plan, Section 4.1.2.3, Revision 15

- h. Make provisions for additional electrical outlets in MRC. (482/8425-36)

Response: Completed

Scheduled Completion Date: N/A

Reference: K&GE Memo L. Koerper to K. Moles, date 1/3/85.

- i. Change the title of EPP 01-2.1 to "Determination of Emergency Classification;" throughout the EPP procedure family, make the proper distinguishment between emergency classification and emergency action levels; include the EPP 01-12.1, paragraph 4.1.1 de-escalation guidelines in EPP 01-2.1 and 01-2.2, either by reference or inclusion. (482/8425-75)

Response: Completed

Scheduled Completion Date: N/A

Reference: A. EPP 01-2.1, Revision 1
B. EPP 01.12.1, Revision 1
C. EPP 01-2.2, Revision 1