

JUN 16 1988

In Reply Refer To:
Docket: STN 50-482/88-12

Wolf Creek Nuclear Operating Corporation
ATTN: Bart D. Withers
President and Chief Executive Officer
P.O. Box 411
Burlington, Kansas 66839

Gentlemen:

Thank you for your letter of May 24, 1988, in response to our letter and Notice of Violation dated April 25, 1988. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,
Original Signed By
L. J. Callan

L. J. Callan, Director
Division of Reactor Projects

cc:
Wolf Creek Nuclear Operating Corporation
ATTN: Otto Maynard, Manager
of Licensing
P.O. Box 411
Burlington, Kansas 66839

Wolf Creek Nuclear Operating Corporation
ATTN: Gary Boyer, Plant Manager
P.O. Box 411
Burlington, Kansas 66839

(cc continued next page)

RIV:SEPS:RPB
NMT
6/1/88

C:SEPS:RPB
RJEvelett
6/4/88

C:RPB
BMurray
6/10/88

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DDChamberlain
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LJCallan
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Wolf Creek Nuclear Operating
Corporation

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Kansas Corporation Commission
ATTN: Robert D. Elliott, Chief Engineer
Fourth Floor, Docking State Office Building
Topeka, Kansas 66612-1571

Program Manager
FEMA Region 7
911 Walnut Street, Room 200
Kansas City, Missouri 64106

Kansas Radiation Control Program Director

bcc to DMB (IE 35)

bcc distrib. by RIV:
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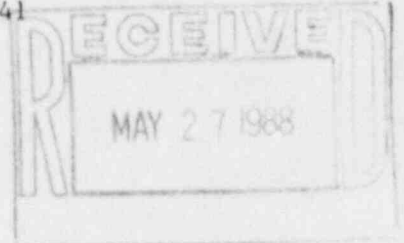
WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

May 24, 1988

WM 88-0141



U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Reference: Letter dated April 25, 1988 from L. J. Callan, NRC to
B. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Notice of Violation
482/8812-01

Gentlemen:

Attached is a detailed response to violation 482/8812-01 which is documented in the Reference. The violation concerns the failure to meet staffing requirements for emergency response team personnel.

If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,

A handwritten signature in cursive script that reads "BD Withers".

Bart D. Withers
President and
Chief Executive Officer

BDW/jad

Attachment

cc: B. L. Bartlett (NRC), w/a
D. D. Chamberlain (NRC), w/a
C. A. Hackney (NRC), w/a
R. D. Martin (NRC), w/a
P. W. O'Connor (NRC), w/a (2)

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Violation (482/8812-01): Emergency Plan and Implementing Procedure

Finding:

Wolf Creek Nuclear Station Technical Specification 6.8, Procedures and Programs, states (6.8.1) that written procedures shall be established, implemented, and maintained covering emergency plan implementation.

Section 1.2.2.1.2 of the Plan states that there are two designated communicators, the NRC Communicator and the Offsite Communicator (OC) in the control room. Emergency Preparedness Procedure (EPP) 01-3.4 shall be implemented to ensure that sufficient personnel are available to staff onsite Emergency Response Facilities (Section 2.1). EPP 01-3.4 directs the OC to contact offsite nonresponding emergency communicators (NREC's). A pyramid call-out system, supplemented with pagers, is used to contact emergency response personnel.

Contrary to the above, announced and unannounced call-out drills were conducted by licensee personnel on January 11 and February 1, 1988, respectively, to determine the availability of emergency response team personnel in the event of an emergency. Based on results from the two call-out drills, the licensee emergency response team did not meet staffing requirements for emergency response team personnel.

Reason for Violation:

The fourth quarter Emergency Response Organization call-out drill was conducted on December 21, 1987 and documented in a report dated January 11, 1988. The fourth quarter call-out drill failed to meet the Wolf Creek Generating Station (WCGS) emergency staffing requirements when personnel to fill the following positions could not be staffed within the required time:

- Health Physics Technicians - 4
- Electrical Maintenance - 1
- Electrical Engineer - 1
- Radiological Assessment Supervisor - 1
- Emergency Operations Facility Coordinator - 1

The existing call-out system did not provide for timely notifications of emergency response personnel to meet the requirements of Table 1.1-1 of the Radiological Emergency Response Plan.

It should be noted that the two dates identified in the finding are actually the dates on which the reports were issued for the call-out drills and not the dates of the drills. As stated above, the January 11, 1988 report documents the fourth quarter drill conducted on December 21, 1987. The February 1, 1988 report documented the results of two call-out tests conducted on December 30, 1987 and January 14, 1988. These two tests were

being used to evaluate a new, unapproved call-out system being developed to correct the deficiencies from previous drills. Since these two tests were conducted on a new unapproved call-out system, WCNOG does not believe the results from these tests should have been included in the violation.

Corrective Steps Which Have Been Taken and Results Achieved:

As stated above, WCNOG had been developing a new method for conducting Emergency Response Organization call-out notifications. As a result of the tests conducted on December 30, 1987 and on January 14, 1988 additional improvements to the modified call-out system were made. This new methodology involves the use of a contract paging service and two automatic dialing units.

The new methodology of call-outs was implemented on March 23, 1988. The implementation of the new methodology required the addition of a new series of Emergency Plan Procedures and revisions to an additional fourteen procedures.

On March 28, 1988, WCNOG conducted an unannounced call-out drill which resulted in meeting the staffing requirements for emergency response personnel.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The corrective steps discussed above should avoid further violations in this area. Quarterly Emergency Response Organization call-out drills will continue to be performed to demonstrate the capability to meet call-out requirements.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on March 28, 1988 with the successful performance of an Emergency Response Organization call-out drill using the revised call-out methodology.