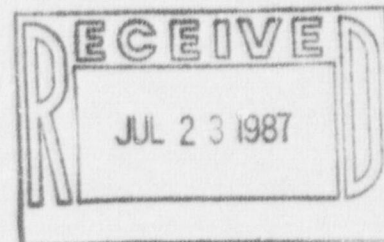


WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

July 21, 1987



R. D. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Letter: WM 87-0197
Re: Docket No. 50-482
Subj: Meeting on WCGS Emergency Classification Scheme

Dear Mr. Martin:

On July 9, 1987 I received a letter from Mr. Eric Johnson of your staff requesting a meeting to discuss what are perceived to be deficiencies in the Wolf Creek Generating Station (WCGS) emergency classification scheme (Reference 1).

From the information provided in the letter it is difficult to determine whether the NRC believes we need to revise the WCGS Radiological Emergency Response Plan (RERP) to more fully comply with the regulations and WCGS commitments or to be more consistent with the guidance of NUREG-0654. If we do not meet WCGS commitments to the NRC or the regulations we will be very responsive to the establishment of a schedule to bring WCGS back into compliance. However, we are concerned if the objective is to have WCGS revise its RERP merely to be more consistent with NUREG-0654. While NUREG-0654 is the primary guidance document used by the NRC to review REPPs, it is a guidance document and not a requirement. Other alternative approaches to emergency planning are allowed provided they are found acceptable to the NRC. The WCGS alternative approach to the emergency classification system was developed by WCGS to be an innovative and improved emergency classification method and was extensively reviewed by the NRC prior to the Staff's approval in December, 1983.

8708030156 870721
PDR ADDCK 05000482
F PDR

87-1348

P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-8831

An Equal Opportunity Employer M/F/H/VET

AD45
11

The key feature of the WCGS RERP's symptomatic approach is the number of fission product barriers which have been challenged or degraded. The classification scheme is independent of the initiating event and does not require the identification of the failure sequence or the cause to properly classify the hazard level in relationship to public health and safety. Since barrier degradation indication is not dependent upon any specific indication but tends to exhibit numerous conditions throughout the plant, operators are able to properly classify the emergency level throughout an event with high probability of accurate classification. When an event-related classification scheme is employed, such as that of NUREG-0654, proper classification is dependent upon proper identification of the event. If the identification of the event is not correct, the probability of inappropriate protective actions is increased. The emergency classification criteria described in the WCGS RERP provides direction to the operators relative to any event, regardless of cause, and provides a criterion upon which to base judgements as to whether mitigating efforts have been successful in retaining those fission product barriers not compromised by the event.

The WCGS emergency classification system and its underlying philosophy is extensively documented in several submittals to the Staff (References 2, 3, & 4 provide examples) and in the Staff's review and approval of our submittals (References 5, 6, & 7). For example in Mr. Johnson's letter (Reference 1) in the first paragraph on page 2, the statement is made that "In addition, the WCGS EAL scheme does not include several example events of NUREG-0654, such as the loss of function needed for shutdown, security events, loss of power, natural events, and evacuation of the control room. These are classified initially as unusual events, but are not escalated unless a fission product barrier is breached or a breach is imminent". A discussion on the classification of emergencies not related to plant malfunctions was submitted to the Staff in 1983 (Reference 3, Q I.c). Based on this and other information the Staff concluded that "...the WCGS emergency classification system can adequately assess and classify emergencies other than those arising directly from plant malfunction." (Reference 5, Section 13.3.2.4).

At WCGS we believe emergency planning is extremely important and we have put a tremendous amount of effort in the development of our emergency response plan. Comparisons between our program and the guidance of NUREG-0654 have been the subject of extensive correspondence and several meetings between WCGS and the NRC Staff. Substantial licensing documentation exists to document the review and approval of our program. We firmly believe our current emergency response plan is effective in terms of protecting the health and safety of the public.

We recognize that the Staff can and will periodically change its technical interpretation concerning what is acceptable. However, if the Staff changes its interpretation after its initial acceptance, the plant specific backfit provisions of 10 CFR 50.109 and NRC Manual Chapter 0514 are applicable and should be complied with prior to imposing the changes on the utility.

Therefore, if the purpose of the meeting is to have WCGS's currently approved RERP changed to fall more in line with the guidance of NUREG-0654, we could discuss the impacts and implications of those imposed changes to assist you in your backfit assessment, but it would not be appropriate to discuss an implementation schedule until the Staff has completed the actions required by 10 CFR 50.109.

There are two specific points in the Reference 1 letter that need further discussion. The first point is that the NRC professes that the delay in upgrading to a General Emergency during our last emergency response exercise supports the stated conclusion that the WCGS RERP is less conservative than NUREG-0654. We have reviewed the WCGS plan against the prescriptive guidance of NUREG-0654 in this area and have concluded that the delay in the DEM's upgrading of the emergency classification would have occurred regardless of which guidance was in place. Both NUREG-0654 and the WCGS approved RERP bases the decision to upgrade the classification on the DEM's judgment and anticipation of containment failure. We responded previously to your concern in this area and have agreed that the DEM should have been more conservative. Therefore, we do not believe the example justifies the escalation of the previous concern from an "Improvement Item" to a program deficiency.

Second, the statement that the "...WCGS plan might be inadequate..." concerns us. It is difficult for us to see any support in the record for this statement from anything provided by the NRC to date. In fact, the bulk of the evidence in terms of several very successful exercises and the detailed review and approval of the plan would support a positive conclusion. As was discussed in the previous paragraph, the example cited was an isolated problem with the lack of conservatism displayed by the DEM and not a problem with the plan. Emergency plans cannot be proceduralized to the point that removes all judgment. Some degree of judgment will always be required and there is no plan that can be written to guarantee that the judgments of the DEM will always be consistent with or as conservative as that of the evaluators. It is our intent that the DEM makes decisions based upon the best available information and his knowledge of the plant while attempting to anticipate future events. We learn from our mistakes in exercises. We must realize that "mistakes" made during exercises form a large part of the educational process of the players exercising and being critiqued afterwards, and that revising the plan is not necessary in many cases.

In summary, WCGS will have appropriate personnel at the July 29, 1987 meeting to discuss our RERP. If the Staff has identified areas in our RERP that fail to meet the requirements, we will be able to establish a schedule for making the necessary changes. If, however, the Staff is asking WCGS to change the approved emergency response plan to be more consistent with NUREG-0654, we will assist you in assessing the impact for backfit analysis

WM 87-0197
July 21, 1987

Page 4

purposes but WCGS does not believe it is appropriate to establish a schedule for changes until these proposed changes are subjected to the requirements of 10 CFR 50.109.

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

Very truly yours,



Bart D Withers
President and
Chief Executive Officer

BDW/jad

cc: PO'Connor (2)
JCummins
CHackney
EJohnson

REFERENCES

1. Letter dated 7/7/87 from EHJohnson, NRC, to BDWithers, WCNO
2. Letter KMLNRC 83-011 dated 1/21/83 from GLKoester, KG&E, to HRDenton, NRC
3. Letter KMLNRC 83-129 dated 10/10/83 from GLKoester, KG&E, to HRDenton, NRC
4. Letter KMLNRC 83-148 dated 11/21/83 from GLKoester, KG&E, to HRDenton, NRC
5. NUREG-0881, Supplement No. 4, "Safety Evaluation Report Related to the Operation of Wolf Creek Generating Station Unit No. 1", December, 1983
6. NUREG-0881, Supplement No. 5, "Safety Evaluation Report Related to the Operation of Wolf Creek Generating Station Unit No. 1", March, 1985
7. NUREG-0881, Supplement No. 6, "Safety Evaluation Report Related to the Operation of Wolf Creek Generating Station Unit No. 1", June, 1985