

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

July 28, 1987

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

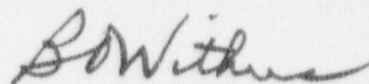
Letter: WM 87-0201  
Re: Docket No. 50-482  
Ref: Letter dated 6/29/87 from JEGagliardo, NRC, to  
BDWithers, WCNOC  
Subj: Response to Violations 482/8714-01 and 482/8714-02

Gentlemen:

Attached is a detailed response to violations 482/8714-01 and 482/8714-02 which were documented in the Reference. Violation 482/8714-01 concerns a failure to document a communication test. Violation 482/8714-02 concerns shift staffing and augmentation.

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

Attachment

cc: PO'Connor (2)  
RMartin  
JCummins  
CHackney

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PDR ADOCK 050004f12  
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Violation (482/8714-01): Failure to Document Communication Test

Finding:

10 CFR 50.54(g) requires that a licensee shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) of this part and the requirements in Appendix E to this part. Wolf Creek Nuclear Station Technical Specification 6.8, "Procedures and Programs," states that written procedures shall be established, implemented, and maintained covering emergency plan implementation.

Emergency Preparedness Procedure 02-1.6, Section 4.5, of the Wolf Creek Nuclear Station Emergency Procedures states that (designated) emergency response facilities communications systems will be tested quarterly and that test results will be documented.

Contrary to the above, on June 4, 1987, the NRC inspector determined that records for quarterly communication tests for the period January through March 1987 were not available for inspection.

This is a violation of Technical Specification 6.8.

Reason for Violation:

The investigation into this violation revealed that the communication links were tested during the 1986 Radiological Emergency Preparedness Exercise conducted on January 28, 1987 but were not documented. This lack of documentation failed to fulfill the requirement in EPP 02-1.6, Section 4.5 which addresses test documentation.

Corrective Steps Which Have Been Taken and Results Achieved:

Records from the 1986 Exercise were reviewed for any communication link deficiencies involving the communication links identified in the quarterly communications checklist. This review indicates no report of such deficiencies. In addition, quarterly communication tests for the period April-June were completed on May 29, 1987 and a retest of one telephone completed on June 8, 1987. The final results were satisfactory.

A tracking system has been developed and will be maintained by the Emergency Planning Administrator. This system includes specific time intervals in which to conduct quarterly communication tests.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

No further action required.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.

Violation (492/8714-02): Shift Staffing and Augmentation

Finding:

10 CFR 50.54(g) requires that a licensee shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) of this part and the requirements in Appendix E to this part. Wolf Creek Nuclear Station Technical Specification 6.8, "Procedures and Programs," states that written procedures shall be established, implemented, and maintained covering emergency plan implementation.

Section 1.2.2.1.2 of the Plan states, in part, that there will be two designated communicators in the control room, the NRC Communicator and the Offsite Communicator (OC). Emergency Preparedness Procedure (EPP) 01-3.4 (Section 2.1) "shall be implemented to ensure sufficient personnel are available to staff onsite Emergency Response Facilities." EPP 01-3.4 assigns a control room communicator (OC) to contact offsite non-responding emergency communicators (NRECs).

Contrary to the above, on June 4, 1987, the licensee was unable to contact either the A primary, secondary, and tertiary, and C primary, secondary, and tertiary communicators.

This is a violation of Technical Specification 6.8.

Reason for Violation:

Onsite manual callout was ineffective for two reasons:

- 1.) Inadequate number of personnel assigned to each of the Non-Responding Emergency Communicator (NREC) A through D positions.
- 2.) The telephone was the only method by which the NRECs A through D could be contacted.



Corrective Steps Which Have Been Taken and the Results Achieved:

Additional personnel have been assigned to and trained for the NREC A through D positions. Pagers have been assigned to key ERO personnel reporting to the on-site facilities and to the NRECs A through D.

EPP 01-3.4, Revision 6, "Onsite Emergency Response Organization Manual Call-Out", incorporates the new call-out methodology. The Radiological Emergency Telephone Directory has been revised to reflect the personnel changes and the new pager assignments.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

A requirement for quarterly call-out drills will be added to procedure EPP 02-1.3, "Drills and Exercises", to ensure call-out adequacy.

Date When Full Compliance Will Be Achieved:

Procedure EPP 02-1.3 will be revised by September 15, 1987.