



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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ARLINGTON, TEXAS 76011-4125

March 4, 2009

Rick A. Muench, President and
Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KS 66839

SUBJECT: ANNUAL ASSESSMENT LETTER – WOLF CREEK GENERATING STATION
(NRC INSPECTION REPORT 05000482/2009001)

Dear Mr. Muench:

On February 11, 2009, the NRC staff completed its performance review of the Wolf Creek Generating Station. Our technical staff reviewed performance indicators for the most recent quarter and inspection results for the period from January 1 through December 31, 2008. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility.

This performance review and enclosed inspection plan do not include security information. A separate letter designated and marked as "Official Use Only - Security-Related Information" will include the security cornerstone review and resultant inspection plan.

Overall, the Wolf Creek Generating Station operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for the most recent quarter, as well as for the first three quarters of the assessment cycle, was within the Licensee Response column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all performance indicators indicating performance at a level requiring no additional NRC oversight (Green). Therefore, we plan to conduct reactor oversight process baseline inspections at your facility.

Our mid-cycle assessment letter dated September 2, 2008, identified a substantive cross-cutting issue in the area of human performance associated with instances of failure to have complete, accurate, and up-to-date documentation, procedures, and/or work packages within the resources component [H.2(c)]. The basis for identifying the substantive cross-cutting issue at that time was five findings which composed a theme. During this assessment period, the number of findings increased to six findings related to the theme of failure to have complete, accurate, and up-to-date documentation, procedures, and/or work packages. These findings affected the Initiating Events, Mitigating Systems, and the Public Radiation Safety cornerstones. Examples include: an inadequate surveillance procedure that did not include all emergency core cooling vent valves, a procedure that did not include acceptance criteria for gaps in the containment sump, an inadequate procedure that resulted in the loss of all condensate pumps and a subsequent reactor trip, and an inadequate switchyard maintenance procedure that led to a loss of all offsite power. During a public meeting with the NRC on October 21, 2008, you

informed us that you had recently completed a root cause analysis of your human performance issues. You also provided details on your Human Performance Initiative Plan and your Maintenance Work Package Quality Initiative Plan, which you were using to address human performance issues. The actions that you implemented have not yet proven effective in substantially mitigating this cross-cutting theme as evidenced by the number of existing findings related to the theme. As a result, this substantive cross-cutting issue will remain open until we determine, through our inspections, that corrective actions implemented in accordance with your improvement plan have resulted in sustained improved performance.

Also, our September 2, 2008, mid-cycle assessment letter identified a substantive cross-cutting issue in the area of problem identification and resolution associated with the corrective action program component. Three themes were identified within the corrective action program component for (1) a low enough threshold for identifying problems [P.1 (a)], (2) thoroughness of problem evaluation [P.1(c)], and (3) appropriateness of corrective actions [P.1 (d)] as the basis for the substantive cross-cutting issue. During this assessment, the substantive cross-cutting issue will remain open in all three areas.

First, at the 2008 mid-cycle assessment, a theme for an inadequate threshold for identifying problems was identified as part of a substantive cross-cutting issue in problem identification and resolution. At that time, there were five issues related to this theme. The theme had been identified at the 2007 annual assessment, but no substantive cross-cutting issue was identified because the issue had recently been identified to you and you had not had time to develop corrective action. In our 2008 mid-cycle assessment letter, we stated that this substantive cross-cutting issue would remain open until we determined that your corrective actions had been effective. During a public meeting with the NRC on October 21, 2008, you informed us that you had taken corrective action which had resulted in an increase in the number of items entered into your corrective action program. We noted this specific improvement by observing that during this assessment period, there was only one finding related to the theme of failure to have an adequate threshold for identifying problems. However, we also observed that there were over 30 NRC identified findings in this assessment period. Even though your staff is identifying more issues, your actions have not proven effective based on the large number of NRC identified findings during this assessment period. Therefore the substantive cross-cutting theme associated with a low enough threshold for identifying problems will remain open.

Next, at the 2008 mid-cycle assessment, a theme associated with the thoroughness of problem evaluation was also identified as part of a substantive cross-cutting issue in problem identification and resolution based on seven related findings. During this assessment period, there were eight findings related to the theme of failing to completely evaluate problems, all in the Mitigating Systems cornerstone. Examples include: failing to ensure submerged safety-related 4160 volt cables were qualified for service, improper evaluation of mechanical agitation of a check valve, improper use of a calculation to justify the operability of emergency core cooling systems containing voids, and failure to perform an adequate acceptance review of a vendor containment sump calculation. In our 2008 mid-cycle assessment letter, we stated that this new substantive cross-cutting issue would remain open until we determined that your corrective actions had been effective. During a public meeting with the NRC on October 21, 2008, you informed us that you had completed a root cause analysis for noted deficiencies related to problem identification and resolution. You informed us that you had implemented a management review program of all condition reports and established an Engineering Standards Team as part of your corrective actions for this theme. We did not observe improvement during this annual assessment period, based on the continued high

number of findings related to the theme. Therefore, the substantive cross-cutting theme associated with the thoroughness of problem evaluation will remain open.

Finally, at the 2008 mid-cycle assessment, a theme associated with the appropriateness of corrective actions was also identified as part of a substantive cross-cutting issue in problem identification and resolution based on seven related findings. During this assessment period, there were eight findings related to the theme of failing to employ effective corrective actions which affected the Mitigating Systems and Barrier Integrity cornerstones. Examples include: ineffective corrective actions for a previously identified inadequate joint which leaked during a water hammer event, ineffective actions for manual valve stem friction which allowed unplanned transfer of water from the spent fuel pool, corrective actions which did not address the missed performance of an operability evaluation for a safety-related system, and failure to take corrective actions which addressed a failure to follow procedures and take compensatory action during a loss of annunciator event. In our 2008 mid-cycle assessment letter, we stated that this new substantive cross-cutting issue would remain open until we determined that your corrective actions had been effective. During a public meeting with the NRC on October 21, 2008, you informed us that you had completed a root cause analysis for noted deficiencies related to problem identification and resolution. You informed us that you had conducted training for site leadership on their role in the corrective action process and planned additional training for root cause evaluators as part of your corrective actions for this theme. We did not observe improvement during this annual assessment period, based on the continued high number of findings related to the theme. Therefore, the substantive cross-cutting theme associated with the appropriateness of corrective actions will remain open.

As a result, this substantive cross-cutting issue in problem identification and resolution will remain open until we determine, through our inspections, that corrective actions implemented in accordance with your improvement plan have resulted in sustained improved performance.

Since this is the second consecutive assessment letter identifying the same cross-cutting issues in problem identification and resolution and human performance, we request that you provide a response to these issues at the annual public meeting. We also ask that you provide a written response to these issues and also schedule a separate public meeting to discuss these issues. Your response should provide details on your corrective actions planned to address the cross-cutting theme including schedule, milestones, and performance monitoring metrics.

The enclosed inspection plan details the inspections, less those related to physical protection scheduled through June 30, 2010. The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last nine months of the inspection plan are tentative and may be revised at the mid-cycle review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Vincent Gaddy of my staff at 817-860-8141 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

Dwight D. Chamberlain, Director
Division of Reactor Projects

Docket: 50-482
License: NPF-42

Enclosure:
Wolf Creek Inspection/Activity Plan

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File located: R:_REACTORS\EOC and Midcycle\EOC Assessment Letters\2008-dated 3-4-09

SUNSI Rev Compl.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ADAMS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reviewer Initials	VGG
Publicly Avail	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Sensitive	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sens. Type Initials	VGG
RIV:C:DRP/B	D:DRS	D:DRP			
VGaddy	RJCaniano	DDChamberlain			
/RA/	/RA/	/RA/			
2/23/2009	2/23/2009	2/24/2009			

OFFICIAL RECORD COPY

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Wolf Creek
Inspection / Activity Plan
03/01/2009 - 06/30/2010

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			EP1 - EP EXERCISE INSPECTION		3
1	06/01/2009	06/05/2009	IP 7111401	Exercise Evaluation	
1	06/01/2009	06/05/2009	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	06/01/2009	06/05/2009	IP 71151	Performance Indicator Verification	
			EB1-17T - 50.59 & MODS		2
1	07/20/2009	07/31/2009	IP 7111117T	Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications	
			EXAM - INITIAL EXAM		6
1	07/13/2009	07/17/2009	X02419	INITIAL EXAM-WC (8/2009)	
1	08/17/2009	08/21/2009	X02419	INITIAL EXAM-WC (8/2009)	
			EB1-08 - INSERVICE INSPECTION		2
1	10/10/2009	11/06/2009	IP 2515/172	Reactor Coolant System Dissimilar Metal Butt Welds	
1	10/10/2009	11/06/2009	IP 7111108P	Inservice Inspection Activities - PWR	
			RP-ORS3 - OCCUPATIONAL RADIATION SAFETY - ALARA		1
1	10/19/2009	10/23/2009	IP 7112101	Access Control to Radiologically Significant Areas	
1	10/19/2009	10/23/2009	IP 7112102	ALARA Planning and Controls	
1	10/19/2009	10/23/2009	IP 71151	Performance Indicator Verification	
			RP-ORS4 - OCCUPATIONAL RADIATION SAFETY - ACCESS		1
1	10/26/2009	10/30/2009	IP 7112101	Access Control to Radiologically Significant Areas	
1	10/26/2009	10/30/2009	IP 7112102	ALARA Planning and Controls	
1	10/26/2009	10/30/2009	IP 71151	Performance Indicator Verification	
			EP-1 - BIENNIAL EP PROGRAM INSPECTION		1
1	06/21/2010	06/25/2010	IP 7111402	Alert and Notification System Testing	
1	06/21/2010	06/25/2010	IP 7111403	Emergency Response Organization Augmentation Testing	
1	06/21/2010	06/25/2010	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	06/21/2010	06/25/2010	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
1	06/21/2010	06/25/2010	IP 71151-EP01	Drill/Exercise Performance	
1	06/21/2010	06/25/2010	IP 71151-EP02	ERO Drill Participation	
1	06/21/2010	06/25/2010	IP 71151-EP03	Alert & Notification System	

This report does not include INPO and OUTAGE activities.
 This report shows only on-site and announced inspection procedures.