



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
612 EAST LAMAR BLVD, SUITE 400  
ARLINGTON, TEXAS 76011-4125

September 1, 2009

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

SUBJECT: MIDCYCLE PERFORMANCE REVIEW AND INSPECTION PLAN - WOLF  
CREEK GENERATING STATION

Dear Mr. Muench:

On August 4, 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 July 1, 2008 through June 30, 2009. 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 Information" will include the security cornerstone review and resultant inspection plan.

Plant performance for the most recent quarter at the Wolf Creek Generating Station 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).

Our midcycle assessment letter dated September 2, 2008, identified a substantive crosscutting 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 crosscutting issue was five findings, which composed a theme in this area. Our end-of-cycle assessment letter dated March 4, 2009, sustained this substantive crosscutting issue. During that assessment period, the number of findings increased to six findings related to the theme. During a public meeting with the NRC on October 21, 2008, you informed us that you had completed a root cause analysis of your human performance issues and 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. Additionally, during a public meeting with the NRC on July 1, 2009, you further informed us of additional initiatives taken as corrective actions in accordance with your improvement plan. We have observed a decrease in the number of human performance related findings which relate to having complete, accurate, and up-to-date documentation, procedures, and/or work packages [H.2(c)]. During this assessment period, only two findings were identified with this common theme, none coming in the last half of the assessment period. As a result of your implemented corrective actions and in light of fewer human performance related findings with this common theme, this substantive crosscutting issue is closed.

At the 2008 midcycle and end-of-cycle assessments, a theme for an inadequate threshold for identifying problems [P.1 (a)] was identified as part of a substantive crosscutting issue in problem identification and resolution. In our 2008 assessment letters, we stated that this theme would remain open until we determined that your corrective actions had been effective. During public meetings with the NRC on October 21, 2008, and July 1, 2009, you informed us that you had taken corrective action to improve your threshold for reporting issues. These corrective actions have resulted in an increase in the number of condition reports and work requests your staff has generated. We also noted this specific improvement by observing there was only one finding in the most recent end-of-cycle assessment and two findings in the current assessment related to the theme of failure to have an adequate threshold for identifying problems. Finally, we also have observed a declining trend in the number of NRC identified issues, from over 30 NRC identified findings in each of the previous two assessment periods to 18 in the current assessment period. Your corrective actions have shown an improving trend; therefore, this substantive crosscutting theme associated with a low enough threshold for identifying problems [P.1 (a)] is closed.

At the 2008 midcycle and end-of-cycle assessments, a theme associated with the thoroughness of problem evaluation [P.1(c)] was also identified as part of a substantive crosscutting issue in problem identification and resolution based on seven and eight related findings, respectively. In both the 2008 midcycle and end-of-cycle assessment letters, we stated that this new substantive crosscutting issue would remain open until we determined that your corrective actions had been effective. During public meetings with the NRC on October 21, 2008, and July 1, 2009, you informed us that you had completed a root cause analysis for noted deficiencies related to problem identification and resolution. You also informed us that you had implemented significant changes in improving the quality of problem evaluation, including root cause evaluator training, conducting a management alignment seminar, and increasing management oversight of problem evaluation. We have noted through recent inspection efforts, including a focused baseline inspection of the residual heat removal system, that you have shown some improvement in this area; however, we did not observe sustained improvement over the entire assessment period. We continue to identify findings associated with this theme including four Green findings associated with this theme identified during this assessment period. Therefore, the substantive crosscutting theme associated with the thoroughness of problem evaluation [P.1(c)] will remain open pending further demonstration of the effectiveness of your corrective actions.

Finally, at the 2008 midcycle and end-of-cycle assessments, a theme associated with the appropriateness of corrective actions [P.1 (d)] was also identified as part of a substantive crosscutting issue in problem identification and resolution based on seven and eight related findings, respectively. In both the 2008 midcycle and end-of-cycle assessment letter, we stated that this new substantive crosscutting issue would remain open until we determined that your corrective actions had been effective. During public meetings with the NRC on October 21, 2008 and July 1, 2009, you informed us that you had completed a root cause analysis for noted deficiencies related to problem identification and resolution and implemented corrective actions. These actions appear to have been effective, since there were only two findings related to the theme of failing to employ effective corrective actions, with none coming in the last three quarters of the assessment period. Therefore, the substantive crosscutting theme associated with the appropriateness of corrective actions [P.1 (d)] is closed.

The substantive crosscutting issue in problem identification and resolution will remain open, based solely on a theme associated with the thoroughness of problem evaluation [P.1(c)]. This

substantive crosscutting issue will remain open until we determine, through our inspections, that corrective actions implemented in accordance with your improvement plan have resulted in improved performance in this area. Of note, this is the third consecutive assessment with a substantive crosscutting area in problem identification and resolution with this common theme. NRC Manual Chapter 0305, "Operating Reactor Assessment Program," states, that "In the third consecutive assessment letter identifying the same substantive crosscutting issue with the same crosscutting aspect, the regional office would typically request that the licensee perform an assessment of safety culture. The regional office could conclude a safety culture assessment is not warranted if the licensee has made reasonable progress in addressing the issue but has not yet met the specific closure criteria for the issue." We note that, although you have not met our criteria for closing this crosscutting theme, you have made reasonable progress in addressing this issue. As such, we have concluded that a safety culture assessment is not warranted at this time. However, we do request that you schedule a public meeting to discuss your continued progress in addressing this area before our next end-of-cycle assessment. We are also evaluating potential changes to the inspection program in the radiation safety cornerstone. Consequently, some specific inspection procedures and the inspection schedule may be revised for 2010.

The enclosed inspection plan details the inspections, less those related to physical protection scheduled through December 31, 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 end-of-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 the inspection plan, we will contact you to discuss the change as soon as possible. Please contact me 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

cc w/Enclosure:  
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File located: R:\EOC and Midcycle\Midcycle Assessment Letters\2009\WC.doc

SUNSI Rev Compl.	<input type="checkbox"/> Yes <input type="checkbox"/> No	ADAMS	<input type="checkbox"/> Yes <input type="checkbox"/> No	Reviewer Initials	VGG
Publicly Avail	<input type="checkbox"/> Yes <input type="checkbox"/> No	Sensitive	<input type="checkbox"/> Yes <input type="checkbox"/> No	Sens. Type Initials	VGG
RIV:SPE/DRP/PBB	C:DRP/PBB	D:DRS	D:DRP		
RWDeese	VGGaddy	RJCaniano	DDChamberlain		
<b>/RA/</b>	<b>/RA/</b>	<b>/RA/</b>	<b>/RA/</b>		
8/18/09	8/19/09	8/20/09	8/24/09		

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## Wolf Creek

## Inspection / Activity Plan

09/01/2009 - 12/31/2010

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			<b>EXAM - INITIAL EXAM</b>		<b>3</b>
1	08/31/2009	09/04/2009	X02419	INITIAL EXAM-WC (8/2009)	
			<b>EB1-08 - INSERVICE INSPECTION</b>		<b>3</b>
1	10/10/2009	10/30/2009	IP 2515/172	Reactor Coolant System Dissimilar Metal Butt Welds	
1	10/10/2009	10/30/2009	IP 7111108P	Inservice Inspection Activities - PWR	
			<b>RP-ORS3 - OCCUPATIONAL RADIATION SAFETY - ALARA</b>		<b>1</b>
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	
			<b>RP-ORS4 - OCCUPATIONAL RADIATION SAFETY - ACCESS</b>		<b>1</b>
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	
			<b>RP-ORS1 - OCCUPATIONAL RADIATION SAFETY - ALARA</b>		<b>1</b>
1	03/15/2010	03/19/2010	IP 7112101	Access Control to Radiologically Significant Areas	
1	03/15/2010	03/19/2010	IP 7112102	ALARA Planning and Controls	
1	03/15/2010	03/19/2010	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	03/15/2010	03/19/2010	IP 71151-PR01	RETS/ODCM Radiological Effluent	
			<b>EP-1 - BIENNIAL EP PROGRAM INSPECTION</b>		<b>1</b>
1	04/12/2010	04/16/2010	IP 7111402	Alert and Notification System Testing	
1	04/12/2010	04/16/2010	IP 7111403	Emergency Response Organization Augmentation Testing	
1	04/12/2010	04/16/2010	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	04/12/2010	04/16/2010	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
1	04/12/2010	04/16/2010	IP 71151-EP01	Drill/Exercise Performance	
1	04/12/2010	04/16/2010	IP 71151-EP02	ERO Drill Participation	
1	04/12/2010	04/16/2010	IP 71151-EP03	Alert & Notification System	
			<b>RP-ORS1 - OCCUPATIONAL RADIATION SAFETY-ACRSA</b>		<b>1</b>
1	05/10/2010	05/14/2010	IP 7112101	Access Control to Radiologically Significant Areas	
1	05/10/2010	05/14/2010	IP 7112102	ALARA Planning and Controls	
1	05/10/2010	05/14/2010	IP 71151	Performance Indicator Verification	
			<b>PSB2-52B - BIENNIAL PI&amp;R</b>		<b>4</b>
1	07/12/2010	07/16/2010	IP 71152B	Identification and Resolution of Problems	
1	07/26/2010	07/30/2010	IP 71152B	Identification and Resolution of Problems	
			<b>EB1-21 - COMPONENT DESIGN BASIS INSPECTION</b>		<b>6</b>
1	09/07/2010	09/10/2010	IP 7111121	Component Design Bases Inspection	

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

**Wolf Creek**  
**Inspection / Activity Plan**  
**09/01/2009 - 12/31/2010**

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			<b>EB1-21 - COMPONENT DESIGN BASIS INSPECTION</b>		<b>6</b>
1	09/20/2010	10/01/2010	IP 7111121	Component Design Bases Inspection	
			<b>BRQ - OPERATOR REQUAL INSP</b>		<b>2</b>
1	10/04/2010	10/08/2010	IP 7111111B	Licensed Operator Requalification Program	
			<b>RP TEAM - RADIATION SAFETY TEAM INSPECTION</b>		<b>4</b>
1	10/18/2010	10/22/2010	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment	
1	10/18/2010	10/22/2010	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems	
1	10/18/2010	10/22/2010	IP 7112202	Radioactive Material Processing and Transportation	
1	10/18/2010	10/22/2010	IP 7112203	Radiological Environmental Monitoring Program (REMP) And Radioactive Material Control Program	
1	10/18/2010	10/22/2010	IP 7113011	Material Control and Accounting (MC&A)	
			<b>EB2-07T - TRIENNIAL HEAT SINK PERFORMANCE</b>		<b>1</b>
1	10/25/2010	10/29/2010	IP 7111107T	Heat Sink Performance	
			<b>EXAM - INITIAL EXAM</b>		<b>4</b>
1	11/08/2010	11/12/2010	X02451	INITIAL EXAM -WC (11/2010)	
1	12/06/2010	12/17/2010	X02451	INITIAL EXAM -WC (11/2010)	

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