

NRR-DMPSPeM Resource

From: Singal, Balwant
Sent: Tuesday, October 9, 2018 2:23 PM
To: Rudeen Jim K
Cc: shsweet@WCNOC.com
Subject: Request for Additional Information - Wolf Creek Generating Station License Amendment Request for Revision to the Emergency Plan (EPID L-2018-LLA-0138)
Attachments: REQUEST FOR ADDITIONAL INFORMATION.docx

By application dated May 9, 2018 (Agencywide Documents Access and Management System (ADAMS) Package Accession Number ML18135A172), Wolf Creek Nuclear Operating Corporation (WCNOC) requested changes to the Wolf Creek Generating Station (WCGS) Radiological Emergency Response Plan (RERP) pursuant to Section 50.54(q) of Title 10 of the *Code of Federal Regulations* (10 CFR). The proposed changes would revise the WCGS RERP to change the emergency response organization (ERO) staffing composition and increase the technical support center (TSC) staff augmentation time during normal working hours from the current 30 minutes to a proposed 75 minutes from the time of declaration of an Alert or higher emergency classification level (ECL).

The proposed changes were reviewed against planning standards (b)(2) and (b)(9) to Section 50.47, "Emergency plans," of 10 CFR 50.47(b)(2) and the requirements of Section IV.A.2 to Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10 CFR Part 50, using the evaluation criteria provided in Section II.B, "Onsite Emergency Organization," to NUREG-0654/FEMA-REP-1 (NUREG-0654), "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

The attached request for additional information (RAI) is necessary to facilitate the technical review being conducted by the U.S. Nuclear Regulatory Commission (NRC) staff. The draft RAI was transmitted to WCNOC on October 1, 2018 and a clarification call was held on October 9, 2018. The WCNOC staff agreed to provide RAI response within 30 days from the date the RAIs are officially transmitted.

Please treat this email as official transmittal of RAIs.

Thanks.

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Subject: Request for Additional Information - Wolf Creek Generating Station License
Amendment Request for Revision to the Emergency Plan (EPID L-2018-LLA-0138)
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REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST FOR
REVISION TO EMERGENCY PLAN
WOLF CREEK NUCLEAR OPERATING CORPORATION
WOLF CREEK GENERATING STATION
DOCKET NUMBER 50-482

RAI-1

Based on a review of the current and proposed WCGS RERP, the NRC staff could not clearly determine who relieves the Shift Manager from the Emergency Direction and Control Function or when the Shift Manager would be relieved by an augmenting ERO member. It appears that the Shift Manager could be relieved as described by any of the following conditions:

- Enclosure I, "Proposed Markup of Procedure AP 06-002," Section 6.6.1 provides that the TSC will be activated within 75 minutes of the declaration of an Alert or higher classification. Upon activation, the ***TSC will have a Site Emergency Manager*** who will assume command-and-control functions;
- Enclosure I, Section 6.6.5 provides that the ***TSC Site Emergency Manager***, who is available 24 hours a day, may assume command-and-control functions from the Shift Manager if so requested by the Shift Manager; or
- Enclosure I, Section 6.8.1 provides that Emergency Operations Facility (EOF) will be activated within 90 minutes of the declaration of an Alert or higher classification. Upon activation, ***the EOF will have a Site Emergency Manager*** who will assume command-and-control functions and direct the emergency from the EOF.

In order for the staff to clearly understand the authorities, responsibilities, and duties of the individual(s) who will take charge during an emergency, as described in Evaluation Criteria II.B.4 to NUREG-0654, please explain the following:

- (a) Explain who assumes the responsibility for Emergency Direction and Control for Alert or greater emergency classifications at WCGS. This explanation should include discussions on the 24 hours a day availability of a Site Emergency Manager that can relieve the Shift Manager, when requested, during an Unusual Event declaration, as well as the availability of the Site Emergency Manager at the TSC within 75 minutes of an Alert or greater emergency classification.
- (b) Explain why Enclosure I, "Proposed Markup of Procedure AP 06-002," of the WCNOG submittal, and Attachment D, "WCGS Staffing Table Staffing," of the WCGS RERP, do not clearly indicate a transfer of responsibility from the Shift Manager to the Site Emergency Manager at 75 minutes of an Alert or greater emergency classification.

RAI-2

Page 3 of 3 to Attachment IV, "Summary of Shift Staffing and Augmentation Response Time Historical Requirements and Proposed Changes," provides that the number of Radiation Protection (RP) Personnel assigned the major tasks of off-site surveys, on-site (out-of-plant) surveys, and in-plant surveys is being reduced from 8 to 6. This table also proposes to reduce the number of RP technicians performing the Protective Actions (In-Plant) function from 4 to 2. However, it is not clear to the staff who actually was going to perform those specific task and where the reduction is occurring.

In order for the staff to clear understand how the minimum staffing levels in Evaluation Criteria II.B.5 to NUREG-0654 are being met and where the reductions are specifically being proposed, please provide a more detailed breakdown (in a table format) of how the RP Personnel are utilized by major task. This table should include the RP Personnel that perform the applicable major tasks in the Radiological Accident Assessment & Support of Operational Accident Assessment, Protective Actions (In-Plant), as well as the survey team technicians who perform off-site field monitoring.

RAI-3

Page 2 of 2 to Attachment V, "Letter of Consultation and Concurrence from Off-site Response Organizations Acknowledgement of Opportunity to Review and Support WCNO License Amendment Request," provides that the State of Kansas and Coffey County were informed of the following, in part:

...NRC approval for extension of the goal for staffing its augmented TSC/OSC [Operations Support Center] Emergency Response Organization (ERO) from the current goal of 60 minutes to one of 90 minutes and reduction of the total number of ERO responders.

However, this is not consistent with the proposed WCNO license submittal. Please explain the reasoning for this apparent discrepancy or provide an updated letter that reflects the proposed changes in the WCNO license application.

RAI-4

Page 16 of 27 to Attachment I states, in part,

The reduction in the Survey Team Technicians from 4 to 3 is possible due to coordination with the State of Kansas. Centralized coordination of the off-site radiological assessment effort with all organizations interested in, and/or performing assessments is necessary to ensure that the data and its interpretation are reviewed by WCNO and off-site response organizations with monitoring and assessment responsibilities. The number and type of organizations performing this effort vary with time and following emergency declarations and off-site notification. Initially, plant emergency response personnel are the only organization performing this function and they are directed from, and their results evaluated, at the EOF [Emergency Operations Facility]. State authorities join the EOF monitoring and assessment activities, forming joint radiological monitoring teams. Commitment RCMS 1985-407 (Reference 10)

requires WCNOG to field 3 teams, plus 1 from the State. This reduction in the survey team technicians from 4 to 3 still maintains the capability to meet that commitment.

WCNOG is requesting to reduce the number of survey team technicians from the current value of four (4) to a proposed level of three (3). WCNOG provides that the reduction in the number of Survey Team Technicians is possible due to coordination with the State of Kansas. To allow the staff to clearly understand the requested action based on the staffing levels in Table B-1 "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies," and Evaluation Criteria II.I.7, "Accident Assessment," to NUREG-0654, please address the following:

- (a) Describe the survey team composition and level of training. For example, are there two (2) radiation protection technicians and two (2) drivers or four (4) radiation protection technicians, and are the survey team members qualified radiation protection technicians or are they individuals who are survey qualified.
- (b) Explain to whom the survey team technicians report to, as they are identified as 60-minute responders with and the TSC and EOF activating at 60 and 90 minutes respectively.
- (c) Explain the difference, if any, between the survey team technicians and the radiological monitoring teams, as described in Section 6.3.8 of the WCGS RERP.
- (d) Explain how coordination with the State of Kansas supports the elimination of a WCGS ERO augmentation survey team technician.

RAI-5

Evaluation Criteria II.I.7 of NUREG-0654 states:

Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations for the facility.

Evaluation Criteria II.I.8 of NUREG-0654 states, in part:

This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times.

Based on a NRC staff review of the information provided in the submittal, it was not clear who is performing field monitoring. Please explain where in the WCGS RERP describes the capability and resources for field monitoring within the Plume Exposure Pathway Emergency Planning Zone.