

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

July 26, 1990

WM 90-0137

U. S. Nuclear Regulatory Commission
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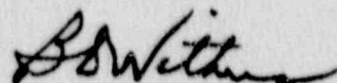
Reference: Letter dated June 26, 1990 from S. J. Collins, NRC, to
B. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Notice of Violation
482/9024-02 and Unresolved Item 482/9024-01

Gentlemen:

This letter provides Wolf Creek Nuclear Operating Corporation's (WCNOG) response to Notice of Violation 482/9024-02 and Unresolved Item 482/9024-01. Notice of Violation 482/9024-02 involved insufficient radiological emergency response training. Unresolved Item 482/9024-01 involved an inconsistency between the WCG's Radiological Emergency Response Plan and an Emergency Response Plan Implementing Procedure.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff.

Very truly yours,



Bart D. Withers
President and
Chief Executive Officer

BDW/aem

Attachment

cc: R. D. Martin (NRC), w/a
D. V. Pickett (NRC), w/a
M. E. Skow (NRC), w/a
D. B. Spitzberg (NRC), w/a
J. S. Wiebe (NRC), w/a

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Violation (4/2/9024-02): Inadequate Emergency Response Training

Finding:

10 CFR 50.47(b)(15) states that radiological emergency response training shall be provided for those who may be called to assist in an emergency. Section 5.1 of the Wolf Creek Radiological Emergency Response Plan states, in part, that specialized initial training and periodic retraining is provided for specified categories of emergency personnel including directors and/or coordinators of the plant emergency organization, and personnel responsible for accident assessment, including control room shift personnel.

Contrary to the above, at the time of the inspection, the inspector determined from interviews of key emergency personnel who might be called upon to respond and assist for accident assessment in an emergency, that their radiological emergency response training was not sufficient. Specifically, individuals responsible for performing dose projections early in an emergency made errors in calculating dose projections which resulted, or could result in improper emergency classification and/or protective action recommendations, to offsite authorities.

Reason For Violation:

Three of four dose assessment personnel did not accurately provide offsite dose assessment in accordance with procedure EPP 01-7.3, Revision 9, "Manual Dose Projection Determination". Incorrect values were obtained from the tables contained as attachments to EPP 01-7.3. A review was performed of the training provided to the dose assessment personnel and of EPP 01-7.3. Based on information evaluated during this review, the root cause of this violation has been attributed to the difficulty in using the tables associated with procedure EPP 01-7.3.

Corrective Steps Which Have Been Taken And Results Achieved:

All dose assessment personnel are receiving retraining within the normal seven week training cycle which began on July 23, 1990. This training is emphasizing performance of dose projections in accordance with EPP 01-7.3. The training is also emphasizing the determination of the proper table to be used as well as stressing the correct use of the selected tables.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

EPP 01-7.3, "Manual Dose Projection Determination", and the associated tables will be revised to enhance their ease of use and to ensure that manual dose calculations can be completed quickly and efficiently. Training on the revised procedure will be completed within the normal seven week training cycles.

Date When Full Compliance Will Be Achieved:

Retraining on EPP 01-7.3 will be completed by September 10, 1990. EPP 01-7.3 will be revised by September 10, 1990. Training on the revised EPP 01-7.3 will be completed by October 31, 1990.

Unresolved Item (482/9024-01): An apparent inconsistency exists between the Emergency Plan and an Emergency Plan Implementing Procedure over the minimum protective action recommendations to be made at a General Emergency.

The inspector reviewed the content of a number of EPPs to determine their consistency with the Emergency Plan. It was noted that an apparent inconsistency existed between EPP 01-10.1, Revision 6, "Protective Action Recommendations," and Section 3.3.2 of the plan entitled, "Offsite Protective Actions." According to the plan, at the General Emergency (GE) classification, either an evacuation, or sheltering will be recommended for affected offsite areas of the emergency planning zone. This is consistent with federal guidance contained in Appendix 1 of NUREG-0654 and for Information Notice 83-23, "Criteria for Protective Action Recommendations for General Emergencies," May 4, 1983. The inspector found, however, that Attachment 1 of EPP 01-10.1 contained a decision making flowchart for the GE which did not recommend a minimum of sheltering if projected doses were available and were less than protective actions guidelines. The minimum recommendation to shelter the center subzone out to 2 miles, and 5 miles downwind should be made at the time a GE is detected, and should be independent of any dose projections available. This will be considered an unresolved item pending the review of licensee information requested concerning this observation.

Discussion:

EPP 01-10.1, Revision 6, "Protective Action Recommendations," combined radiological and operational considerations into one chart utilizing protective action guidelines. It was believed at the time of the change that the revision was still in compliance with the Radiological Emergency Response Plan (RERP) and federal guidelines. It was not believed to be a decrease in the effectiveness of the plan.

The methodology in the attachment to the procedure indicated when projected dose assessments were less than protective action guidelines, the recommendation of minimum sheltering was not made. It has subsequently been determined that this judgement was not correct. As pointed out by the inspector, this was not in compliance with the RERP or federal guidelines. The root cause of this misjudgment was a procedural weakness in EPP 02-1.1, "Emergency Planning Program", which did not explicitly require the review of EPP changes to ensure compliance with the RERP.

Resolution/Corrective Actions:

Procedure EPP 01-10.1, Attachment 1, will be revised to recommend shelter in a General Emergency independent of available dose projections. EPP 01-10.1 will be revised by August 17, 1990.

In addition, EPP 02-1.1, "Emergency Planning Program", will be revised by August 29, 1990 to include a provision that the RERP shall be reviewed when revising an EPP to ensure that procedure revisions comply with the RERP. This administrative control should eliminate future inconsistencies and assure the effectiveness of the plan is not decreased without prior NRC approval.