

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-4005

March 3, 2008

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 05000482/2008001)

Dear Mr. Muench:

On February 5, 2008, 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, 2007. 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.

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.

During the 2006 Annual Assessment and the 2007 Midcycle Assessment, the NRC identified a crosscutting theme associated with the work practices component of the human performance area related to the failure to use and/or communicate human error prevention techniques. During the current performance period, the NRC staff identified a substantive crosscutting issue in the human performance area at Wolf Creek. There were eight findings associated with the work practices component of the human performance area. Four of these findings had a common theme related to the failure to use and/or communicate human error prevention techniques. The remaining four findings had a common theme related to the failure to communicate expectations regarding procedural compliance. These findings occurred in the Initiating Events, Mitigating Systems, and Barrier Integrity cornerstones. These deficiencies resulted in: tripping a condensate pump and subsequent steam generator level transient, inadvertent isolation of both containment purge radiation monitors, a reactor downpower due to an automatic turbine load reduction due to the unplanned trip of a circulating water pump, and a

failure to maintain sufficient logs which complicated control room operators' ability to evaluate emergency action levels and Technical Specifications during the unexpected loss of a significant number of main control board annunciators during a routine power supply replacement.

As discussed above, failure to use human error prevention techniques is a continuation of the theme discussed in both the annual assessment and midcycle assessment letters dated, March 3, 2007, and August 31, 2007, respectively. In each of these assessment letters, the NRC acknowledged that you were aware of this theme and were implementing corrective action to address this theme. As early as 2004, your staff identified negative trends in human performance and implemented corrective action to address this trend. Subsequent assessments indicated that these actions were less than fully effective. Some of the specific actions you implemented to address this theme included the development of a Human Performance Initiative, led by site management. Specific actions in this initiative included: promoting excellence by ensuring station personnel understand and demonstrate human performance fundamentals, ensuring coaching and oversight are effective at achieving desired performance, ensuring root cause and apparent cause evaluations effectively identify organization and process contributors, and ensuring personnel take ownership of station performance by demonstrating sensitivity for error likely situations and developing defensive strategies. Since its implementation, the Human Performance Initiative has not been fully effective. This is demonstrated by the continuation of the human error prevention theme and the identification of a new theme that involves the failure to communicate expectations regarding procedural compliance. Your actions, to date, have not proven effective in mitigating this crosscutting issue. As a result, the human performance substantive crosscutting issue will remain open until we determine, through the implementation of the focused baseline inspections, that corrective actions have been effective.

The staff also identified that there were more than three Green inspection findings for the current 12-month assessment period with documented crosscutting aspects in the problem identification and resolution area. There is a crosscutting theme associated with these findings that involves the failure of site personnel to implement corrective action with a low threshold to allow for the complete, accurate, and timely resolution of issues. While there were more than three Green inspection findings with documented crosscutting aspects in problem identification and resolution associated with this crosscutting theme, we understand that this represents a recent performance trend. Once identified, you placed the issue into your corrective action program and are currently developing plans to address this issue. Because you have taken actions to address this recent performance trend, the staff did not identify a substantive crosscutting issue in problem identification and resolution. We will monitor the effectiveness of your corrective actions during the next performance period.

The enclosed inspection plan details the inspections, except those related to physical protection scheduled through June 30, 2009. In addition to the baseline inspection program, we plan to conduct Temporary Instruction 2515/150, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzles." 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 midcycle 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 me at 817-860-8141 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

Vincent G. Gaddy, Chief Reactor Projects Branch B Division of Reactor Projects

Docket: 50-482 License: NPF-42

Enclosure:

Wolf Creek Generating Station Inspection/ Activity Plan

cc w/enclosure:

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Wolf Creek

Inspection / Activity Plan

03/01/2008 - 06/30/2009

EP Baseline Inspection EP Baseline Inspection EP Baseline Inspection EP Baseline Inspection Baseline Inspections Inspection Type 03/03/2008 04/07/2008 Safety Issues 04/11/2008 04/04/2008 10/03/2008 10/10/2008 10/24/2008 04/04/2008 04/04/2008 04/04/2008 09/19/2008 09/12/2008 09/12/2008 09/12/2008 10/10/2008 10/24/2008 09/12/2008 10/10/2008 10/10/2008 12/19/2008 12/19/2008 12/19/2008 12/19/2008 12/19/2008 12/19/2008 12/19/2008 End Planned Dates 03/31/2008 33/31/2008 03/31/2008 03/31/2008 03/31/2008 09/15/2008 09/29/2008 10/20/2008 09/08/2008 09/08/2008 09/08/2008 0/06/2008 0/06/2008 0/06/2008 10/20/2008 2/15/2008 12/15/2008 12/15/2008 12/15/2008 2/15/2008 09/08/2008 0/06/2008 12/15/2008 12/15/2008 Start No. of Staff on Site Ŋ Radiological Environmental Monitoring Program (REMP) And Radioactive Material Control Program Reactor Pressure Vessel Head and Vessel Head Penetration Nozzles (NRC ORDER EA-03-009) Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems Correction of Emergency Preparedness Weaknesses and Deficiencies Radiation Monitoring Instrumentation and Protective Equipment Emergency Response Organization Augmentation Testing Emergency Action Level and Emergency Plan Changes Radioactive Material Processing and Transportation Access Control to Radiologically Significant Areas Access Control to Radiologically Significant Areas - OCCUPATIONAL RADIATION SAFETY - ACCESS Title - OCCUPATIONAL RADIATION SAFETY - ALARA Occupational Exposure Control Effectiveness Occupational Exposure Control Effectiveness Licensed Operator Requalification Program - RADIATION SAFETY TEAM INSPECTION Alert and Notification System Testing Inservice Inspection Activities - PWR INSERVICE INSPECTION ACTIVITIES RETS/ODCM Radiological Effluent RETS/ODCM Radiological Effluent ALARA Planning and Controls ALARA Planning and Controls - TRIENNIAL FIRE PROTECTION - BIENNIAL REQUALIFICATION Drill/Exercise Performance Alert & Notification System Fire Protection [Triennial] - VESSEL HEAD INSPECTION Fire Protection [Triennial] Fire Protection [Triennial] **ERO Drill Participation EP PROGRAM** nspection Activity IP 71151-OR01 IP 71151-PR01 IP 71151-0R01 IP 71151-PR01 71151-EP03 IP 71151-EP02 IP 71151-EP01 IP 7111105T IP 711111B IP 7111108P IP 7111105T P 7111105T IP 7112102 IP 2515/150 IP 7112102 IP 7112103 IP 7112202 IP 7112203 IP 7111403 IP 7111405 IP 7112101 IP 7112101 IP 7111404 IP 7112201 IP 7111402 EB2-05T RP TEAM RP-ORS1 RP-ORS2 REGUAL 2515/150 EP2 Number Unit

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

Inspection / Activity Plan Wolf Creek

14:55:41

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03/01/2008 - 06/30/2009

Unit			No. of Staff	Planned Dates	I Dates	Inspection	
Number	Inspection Activity	vity	on Site	Start	End	Type	
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	2	- EP EXERCISE INSPECTION	, O				
	IP 7111401	Exercise Evaluation		05/18/2009	05/22/2009 E	05/18/2009 05/22/2009 EP Baseline Inspection	_
-	IP 7111404	Emergency Action Level and Emergency Plan Changes		05/18/2009	05/22/2009 E	05/18/2009 05/22/2009 EP Baseline Inspection	_
-	IP 71151	Performance Indicator Verification		05/18/2009	05/22/2009 E	05/18/2009 05/22/2009 Baseline Inspections	

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

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SUNSI Review Completed: <u>VGG</u> ADAMS: √Yes □ No Initials: <u>VGG</u>

√ Publicly Available □ Non-Publicly Available □ Sensitive √ Non-Sensitive

R:_Reactors\EOC and Midcycle\EOC Assessment Letters\2007 - dated 3-3-08\WC.doc

RIV:C:DRP/B D:DRS D:DRP C:DRP/B

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