



Stephen L. Smith
Plant Manager

July 1, 2015

WO 15-0039

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: Docket No. 50-482: Licensee Event Report 2015-004-00, "Inadequate Procedure Results in Two Containment Isolation Valves being in a Condition Prohibited by Technical Specifications"

Gentlemen:

The enclosed Licensee Event Report (LER) 2015-004-00 is being submitted pursuant to 10 CFR 50.73(2)(i)(B) regarding an inadequate procedure that resulted in two containment isolation valves being inoperable at Wolf Creek Generating Station.

This letter contains no regulatory commitments. If you have any questions concerning this matter, please contact me at (620) 364-4093, or Mr. Steven R. Koenig at (620) 364-4041.

Sincerely,

A handwritten signature in black ink, appearing to read "S. L. Smith".

Stephen L. Smith

SLS/rlt

Enclosure

cc: M. L. Dapas (NRC), w/e
C. F. Lyon (NRC), w/e
A. A. Rosebrook (NRC), w/e
Senior Resident Inspector (NRC), w/e

IE22
NRR



LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

1. FACILITY NAME

WOLF CREEK GENERATING STATION

2. DOCKET NUMBER

05000 482

3. PAGE

1 OF 3

4. TITLE Inadequate Procedure Error Results in Two Containment Isolation Valves being in a Condition Prohibited by Technical Specifications

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
05	05	2015	2015	004	00	07	01	2015	FACILITY NAME	DOCKET NUMBER
										05000
										05000

9. OPERATING MODE	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)			
1	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
10. POWER LEVEL	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME

Steven R. Koenig, Manager Regulatory Affairs

TELEPHONE NUMBER (Include Area Code)

620-364-4041

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED

☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE)
 ☒ NO

15. EXPECTED SUBMISSION DATE

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On May 5, 2015, it was discovered that the motive force (air supply) was not removed for two containment shutdown purge valves as required by Technical Specification 3.6.3, "Containment Isolation Valves." The motive force was restored to allow the performance of procedure STS KJ-001A, "Integrated Diesel Generator and Safeguards Actuation Test – Train A," on April 26, 2015. After performance of procedure STS KJ-001A, the motive force was not removed for the two containment shutdown purge valves. The plant entered Mode 4 on April 28, 2015 at 0144 Central Daylight Time (CDT).

Upon discovery, the air supply valves for the two containment shutdown purge valves were locked closed, removing the motive force. The cause of the event was procedure AP 21G-001, "Control of Locked Component Status," had inadequate guidance to ensure new components listed in the Locked Component Log were properly tracked as a mode restraints. The safety significance of the event was low as each penetration flow path had a redundant valve that was closed with the motive force removed.

**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

APPROVED BY OMB: NO.3150-0104

EXPIRES: 01/31/2017

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollections.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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NARRATIVE**PLANT CONDITIONS PRIOR TO THE EVENT**

Mode - 1

Power - 100%

There were no systems, structures or components (SSC) that were inoperable at the start of the event and contributed to the event.

DESCRIPTION

On April 24, 2015, Wolf Creek Generating Station (WCGS) was in Refueling Outage 20. Procedure STS GT-002, "Ctmt Purge Supply/Exhaust Iso Valve Verification," was performed in preparation from changing from Mode 5 to Mode 4. This procedure closes the containment (Ctmt) shutdown purge valves [EIS: JM-V] and removes the motive force from them. The motive force is an air supply valve that is locked closed. During this procedure, the motive force (air supply) for valves GTHZ0007 (Ctmt shutdown Purge Supply Inside Ctmt Iso Butterfly Valve) and GTHZ0009 (Ctmt shutdown Purge Exhaust Outside Ctmt Iso Butterfly Valve) were locked closed and independently verified.

On April 26, 2015, procedure STS KJ-001A, "Integrated D/G and Safeguards Actuation Test - Train A," was being performed. During the pre-test alignment for this procedure, valves GTHZ0007 and GTHZ0009 were required to be placed in the open position. Procedure STS KJ-001A does not realign the air supply valves for the Ctmt shutdown purge valves, so the air supply valves were placed in the Locked Component Log to track their status. On April 26, 2015 at 1215 Central Daylight Time (CDT), the air supply valves for valves GTHZ0007 and GTHZ0009 were opened and documented in the Locked Component Log. During the post-test alignment of procedure STS KJ-001A, valves GTHZ0007 and GTHZ0009 were closed. But the air supply for valves GTHZ0007 and GTHZ0009 were not locked closed since procedure STS KJ-001A did not address them. The restoration section of procedure STS KJ-001A was performed by a different crew than initially opened the valves and they did not recognize the air supply valves were being controlled by the Locked Component Log.

On April 28, 2015, at 0144 CDT, the plant entered Mode 4. As part of the Mode 4 preparations, procedure AP 21G-001, "Control of Locked Component Status," was reviewed per procedure GEN 00-002, "Cold Shutdown to Hot Standby," step E.24. This review did not find the air supply valves that were required to be locked closed before entry into Mode 4, as they had been signed off in procedure AP 21G-001 as locked closed on April 24, 2015. The Locked Component Log was not reviewed immediately prior to the mode change.

On May 5, 2015, the Locked Component Log was being consolidated and it was discovered that the air supply valves for GTHZ0007 and GTHZ0009 still indicated they were in the open position. On May 5, 2015, at 1000 CDT, Limiting Condition for Operation (LCO) 3.6.3 was declared not met and Condition A entered for the air supply valves not being in the locked closed position. On May 5, 2015, at 1120 CDT, Condition A of LCO 3.6.3 was exited when both air supply valves were verified to be locked closed.

CONTINUATION SHEET

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NARRATIVE

REPORTABILITY

Technical Specification (TS) 3.6.3, "Containment Isolation Valves," requires each containment isolation valve shall be operable in Modes 1, 2, 3, and 4. To be operable, valves GTHZ0007 and GTHZ0009 must be closed with the motive force removed. TS LCO 3.6.3 was determined to be not met on May 5, 2015 at 1000 CDT when it was discovered that the motive force for valves GTHZ0007 and GTHZ0009 was not removed. TS 3.6.3 Condition A, Required Action A.1, requires the affected penetration flow path to be isolated within 12 hours. Investigation showed that the air supply valves were not locked closed from April 28, 2015, at 0144 CDT, when the plant entered Mode 4, through May 5, 2015, at 1120 CDT.

This event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B) as an operation or condition which was prohibited by TS, when it was determined that the Conditions and Required Actions of LCO 3.6.3 and LCO 3.0.4 were not met for valves GTHZ0007 and GTHZ0009.

CAUSE

Once issued, procedure AP 21G-001 has inadequate guidance to track new components listed in the manual Locked Component Log as mode restraints during plant start-ups. The procedure STS KJ-001A, which required the Ctmt shutdown purge valves open in order to check the auto closure function, did not contain steps to open them or verify restoration of the air lineup.

CORRECTIVE ACTIONS

On May 5, 2015, at 1120 CDT, the air supply valves for GTHZ0007 and GTHZ0009 were locked closed and verified, removing the motive force.

Procedure AP 21G-001 will be revised to ensure an Equipment Out of Service Log (EOL) entry is made for components which would impact mode change that are taken out of their required position.

SAFETY SIGNIFICANCE

The safety significance of this event was low. Though the motive force was not removed, valves GTHZ0007 and GTHZ0009 were closed in their safeguards position. In addition valves GTHZ0007 and GTHZ0009 have redundant valves in series that were closed with the motive force removed. Each penetration flow path had one operable valve that was closed with its motive force removed.

OPERATING EXPERIENCE/PREVIOUS EVENTS

None