

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

March 22, 1990  
WM 90-0069

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

Reference: Letter dated February 20, 1990 from S. J. Collins, NRC,  
to B. D. Withers, WCNOG  
Subject: Docket No. 50-482: Response to Violation 482/9002-  
01 and 02

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) reponse to violation 482/9002-01 and 02 which were documented in the Reference. Violation 482/9002-01 involved the failure to perform a safety evaluation and violation 482/9002-02 involved inadequate corrective action on chainfalls.

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/jad

Attachment

cc: R. D. Martin (NRC), w/a  
D. Persinko (NRC), w/a  
D. V. Pickett (NRC), w/a  
M. E. Skow (NRC), w/a

9003290193 900322  
PDR ADOCK 05000482  
Q PDC

P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-8831

An Equal Opportunity Employer M/F/HG/VET

11  
TED1

Violation (482/9002-01): Failure to Perform a Safety Evaluation

Finding:

Title 10 CFR Part 50.59, paragraph (b)(1), requires, in part, that records of changes must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, on January 2, 1990, the inspectors identified that the licensee temporarily removed a missile shield to one of two trains of essential service water, which constituted a change to the facility as described in the safety analysis report, without first performing a written safety evaluation. This is a repeat of a previous violation (482/8907-01).

Reason For Violation:

Removal and reinstallation of the "A" train Essential Service Water valve pit manway cover was accomplished under Work Request 05117-89. This action resulted in a change to the facility as described in the Wolf Creek Generating Station Updated Safety Analysis Report in that the manway cover has a design function of a missile barrier.

Performing this action without performing the necessary safety evaluation was due to a failure of personnel to realize that this activity constituted a change to the facility.

Corrective Steps Which Have Been Taken And Results Achieved:

Procedure CNT-660, "Rigging" has been revised to incorporate safety-related manway covers which may be removed without an additional safety evaluation as the safety evaluation performed for the procedure revision identified that no unreviewed safety question exists. This procedure revision and safety evaluation was reviewed by the Plant Safety Review Committee.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The identification of specific safety-related manways covers, that may be removed in accordance with CNT-660, "Rigging" provides the required safety evaluation for pulling these manways.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.



Violation (482/9002-02): Inadequate Corrective Action on Chainfalls

Finding:

Title 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action" states, in part, that in the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, on January 12, 1990, the inspectors identified a repeat condition adverse to quality for which inadequate corrective action had been taken in that the inspectors observed a chainfall tied off to the fuel oil supply line to "B" Diesel Generator, a condition potentially affecting the operability of the diesel generator, which was the repeat of a condition identified to the licensee on March 7, 1988.

Reason For Violation:

Previous corrective actions have been ineffective in providing positive controls as these actions were directed primarily at specific situations while overall programmatic controls were not fully addressed.

Corrective Steps Which Have Been Taken And Results Achieved:

The hoist pull chains observed to be tied off to the fuel oil supply line "B" Diesel Generator was removed and tied off at a hook provided. Operations personnel inspected other areas of the plant to correct any similar problems.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

A written communication describing the correct use and storage of cranes/hoists will be distributed to appropriate plant personnel by April 6, 1990. Procedure ADM 01-110, "Housekeeping Control" requires periodic inspections to assure adequacy of housekeeping practices. The Housekeeping Inspection Record will be revised by April 20, 1990 to include a check for proper securing of hoist pull chains.

As an additional enhancement, permanent tie-offs and signs will be provided, as practicable, to remind personnel to properly secure the hoist pull chains upon completion of work activities. The watchstation log and reading sheets will be revised to include the checking of hoist pull chains by operations personnel.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by August 1, 1990.