

WOLF CREEK

NUCLEAR OPERATING CORPORATION

February 25, 1993
WM 93-0030

Bart D. Withers
President and
Chief Executive Officer

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

Reference: 1) Letter NO 91-0169 dated June 21, 1991 from J. A. Bailey, WCNOC to U. S. Nuclear Regulatory Commission
2) Letter NO 92-0079 dated March 27, 1992 from J. A. Bailey, WCNOC to U. S. Nuclear Regulatory Commission
3) Letter WM 92-0136 dated August 21, 1992 from B. D. Withers, WCNOC to U. S. Nuclear Regulatory Commission

Subject: Docket No. 50-482: Revised Schedule for Completion of Corrective Action on IST Valve Program/Procedures Upgrade

Gentlemen:

The purpose of this letter is to provide a revised schedule for the completion of corrective actions identified in Licensee Event Report (LER) 482/91-007-00 and Response to Violation 482/9209-01. Reference 1 transmitted LER 91-007-00 concerning an inadequate inservice testing (IST) procedure used to perform certain valve testing at Wolf Creek Generating Station (WCGS). Reference 3 transmitted Response to Violation 9209-01 concerning inservice testing of an ASME Code Class 2 pump contrary to the requirements of Technical Specification 4.0.5.

BACKGROUND

As part of the corrective actions associated with these events, Wolf Creek Nuclear Operating Corporation (WCNOC) committed to undertake a complete technical review of IST procedures to ensure their technical adequacy and compliance with the ASME Code. LER 91-007-00 made the original commitment to review and revise IST procedures as necessary to meet the requirements of Nuclear Regulatory Commission (NRC) Generic Letter (GL) 89-04. Specifically, WCNOC committed to review procedures for refueling IST activities prior to the fifth refueling outage and to complete the review of other IST procedures by March 31, 1992. The review of and necessary changes to refueling IST procedures were completed as scheduled prior to the beginning of the fifth refueling outage in September, 1991. However, the schedule for the review and procedure changes of the remaining IST procedures was delayed and a revised schedule for completion of the commitment was submitted by Reference 2. This revised schedule stated that review of IST pump procedures would be completed by March 31, 1992, with the necessary procedure changes being completed by May 31, 1992. This revised

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schedule also stated that the review of IST valve procedures would be completed by December 31, 1992, with the necessary procedure changes being completed by February 28, 1993. In Response to Violation 9209-01 all commitments associated with LER 91-007-00 and Inspection Report 482/92-09 were consolidated and a date of March 1, 1993, was set to complete all actions associated with the IST program upgrade.

REASONS FOR EXTENSION OF COMMITMENT DUE DATE

The review of the IST pump procedures was completed by March 31, 1992, and the necessary procedure changes were completed by May 3, 1992. Currently, there are approximately 90 IST procedures which require valve testing. All of these procedures have been reviewed against the requirements of GL 89-04 and the appropriate revisions have been drafted. Approximately two-thirds of the IST valve procedures are in the final review and approval process. However, these procedures cannot be finalized until Pump and Valve Inservice Testing Program Relief Request VR-24, which proposes the adoption of ASME/ANSI OMa-1988, Part 10 in place of Section XI IWV, is approved by the NRC. ASME/ANSI OMa-1988, Part 10 incorporates later industry provisions for valve testing and is considered by WCNOG to be a better method of testing than Section XI IWV. Since the valve procedures were being rewritten and WCNOG will be required to adopt the provisions of ASME/ANSI OMa-1988, Part 10 by 1995, a decision was made to make the necessary changes to meet the requirements of GL 89-04 and adopt the provisions of ASME/ANSI OMa-1988, Part 10 at the same time. By combining the two efforts, the valve procedures will not have to be revised twice and the IST Program should be improved with the use of ASME/ANSI OMa-1988, Part 10 prior to 1995. Per discussions with the NRC Project Manager, Mr. William Reckley, it is expected that Relief Request VR-24 should be approved by February 26, 1993. Following approval of the relief request, the IST valve procedures will be finalized and will include all upgrades to GL 89-04 and ASME/ANSI OMa-1988, Part 10.

An IST Design Basis Document, which identifies the testing requirements for each component and the basis for inclusion or exclusion in the IST Program, is in draft version and has been distributed within WCNOG for technical review. The IST Design Basis Document is being developed based on recommendations by an engineering consulting firm to improve the IST program. This document has been built on a computer database and is fully functional at this time. It is taking longer than originally anticipated to complete the IST Design Basis Document and at this point it is not anticipated that all of the reviews and incorporation of comments will be completed by March 1, 1993.

An IST Design Basis review has identified an open items list which includes possible additions or deletions that could be made to improve the IST program. The IST Design Basis review open items must be completely addressed before the IST program upgrade can be considered complete. There are approximately 200 additional testing requirements which will be addressed and the results will be documented. Following the sixth refueling outage, the IST Design Basis review open items list will be reviewed in detail to determine if changes need to be made to the scope of testing in the IST program. If changes are determined necessary, additional testing requirements will be added to existing procedures or new procedures will be required to be written. The possible changes to the program are considered enhancements.

Procedure ADM 05-200, "ASME Code Testing of Pumps and Valves," is being revised and is in the final review and approval process. Procedure ADM 05-200 is being revised to incorporate improvements identified in WCNOG's self assessment as well as NRC and INPO audits. However, as with the IST valve procedures, procedure ADM 05-200 cannot be finalized until Relief Request VR-24 is approved by the NRC.

IMPACT OF DUE DATE EXTENSION

The review of all procedures to the requirements of NRC GL 89-04 has been completed and no outstanding immediate safety concerns are present in the IST program. The changes to the IST valve procedures are improvements and the delay of issuance does not impact plant safety or affect compliance with Technical Specification 4.0.5 or ASME Section XI. The possible changes to the IST program based on the actions developed from the IST Design Basis review open items list are considered enhancements.

REVISED COMMITMENT DUE DATE

Because of the additional work of adopting ASME/ANSI OMA-1988, Part 10 and the other factors discussed above, rescheduling completion of the IST program upgrade is necessary. The IST program upgrade, which includes revising IST valve procedures and ADM 05-200, finalization of the IST Design Basis Document, and review and incorporation of the IST Design Basis review open items list, will be completed by October 29, 1993.

WM 93-0030
Page 4 of 4

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4000 or Mr. Kevin J. Moles of my staff at extension 4565.

Very truly yours,

A handwritten signature in dark ink, appearing to read "B. Withers". The signature is fluid and cursive, with a large initial "B" and a stylized "W".

Bart D. Withers
President and
Chief Executive
Officer

BDW/jan

cc: W. D. Johnson (NRC)
J. L. Milhoan (NRC)
G. A. Pick (NRC)
W. D. Reckley (NRC)