

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan  
Vice President Nuclear Assurance

March 2, 1993

NA 93-0055

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

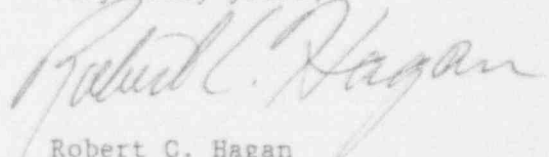
Reference: Letter dated February 1, 1993 from A. B. Beach, NRC to  
B. D. Withers, WCNOC  
Subject: Docket No. 50-482: Response to Violation 482/9232-02

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOC) response to Violation 482/9232-02 which documented in the Reference. Violation 482/9232-02 involved the failure to have appropriate procedural guidance to ensure the Spent Fuel Transfer Canal Gate would not be positioned over the fuel. Also documented in the Reference was Violation 482/9232-01 which involved the failure to follow written instructions during the removal of Spent Fuel Pool Cooling Pump "A" inboard bearing. Per discussions with Mr. Greg Pick, NRC Senior Resident Inspector, and Mr. Chris Kennedy, Acting NRC Section Chief for Region IV, WCNOC requested an extension to March 15, 1993, to respond to Violation 482/9232-01. This extension was approved by the NRC, as noted in a followup telecon between Mr. Chris Kennedy and T. L. Riley, Supervisor Regulatory Compliance, on March 2, 1993.

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,



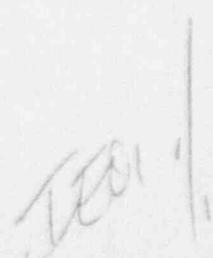
Robert C. Hagan  
Vice President  
Nuclear Assurance

RCH/jan

Attachment

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

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Reply to Notice of Violation

Violation 9232-02: Inadequate Spent Fuel Pool Bridge Crane Operating Procedure

Failure to have adequate procedural guidance to ensure the fuel transfer canal gate would not be positioned over the fuel.

Finding:

"Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978. 10CFR50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings", in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstance.

Regulatory Guide 1.33, Appendix A, Item 2.k, recommends procedures for refueling equipment operation. This is accomplished, in part, by procedure FHP 03-007, Revision 13, "Spent Fuel Pool Bridge Crane Operating Instructions and Daily Checks".

Step 7.8 procedure FHP 03-007 specifies steps for moving the spent fuel pool gate. The instructions included cautions to ensure that the mechanical stops were installed and to ensure that the spent fuel pool gate was not lifted more than one foot above the fuel assemblies.

Contrary to the above, the cautions associated with Step 7.8 were inappropriate to the circumstances because they did not provide adequate guidance to ensure that the fuel transfer canal gate was not positioned over fuel assemblies. On November 5, 1992, while inspecting a spent fuel pool gate seal, licensee personnel moved the spent fuel pool gate such that it may have been positioned over some fuel assemblies."

Admission Or Denial Of The Alleged Violation:

WCNOC denies the alleged violation.

Reason For Denial Of The Violation:

Procedure FHP 03-007, Revision 13, "Spent Fuel Pool Bridge Crane Operating Instructions And Daily Checks", Section 4.0 "Notes and Precautions" contained precaution 4.9 stating, "There shall be no crane operations directly over stored fuel other than that required for fuel handling."

Prior to being allowed to operate the spent fuel pool bridge crane all Operations Personnel must first be qualified in accordance with procedure CKL WQ-009, Revision 1, "Fuel Handling Operator Special Qualification Card". This procedure requires the operator to demonstrate a strong working knowledge of the technical specification fuel bridge crane travel restrictions.

The assigned operator on the date of the alleged violation was qualified in accordance with this procedure. Additionally, when questioned after the alleged violation the operator provided a detailed explanation of the fuel bridge crane travel restrictions contained in the technical specifications.

This demonstrated he was indeed knowledgeable of Technical Specification 3.9.7 limitations (that loads in excess of 2250 pounds shall be prohibited from travel over fuel assemblies in the spent fuel pool).

Interviews with personnel involved indicated that Pre-Job Briefings conducted prior to the fuel canal gate seal replacement activity were very detailed. The briefing included a discussion of acceptable load paths for the movement of the fuel transfer canal gate during the seal replacement activity. All personnel were aware of the fuel bridge crane travel restrictions contained in the technical specifications.

Upon identification of the alleged event, Wolf Creek Nuclear Operating Corporation conducted a thorough investigation to determine if the personnel were aware of the crane travel restrictions and to determine if the restrictions were violated. This investigation clearly showed all personnel were aware of the restriction and used the necessary precautions to prevent the technical specification restrictions from being violated. The results of the investigation (as documented in Reportability Evaluation Request 92-077) showed the restrictions were not violated.

WCNOC does acknowledge the placement of an additional precaution statement, regarding Technical Specification 3.9.7 load limitations, prior to step 7.8, Spent Fuel Pool Gate Operations, of FHP 03-007 is a procedure enhancement worth implementing. This addition was accomplished on 12-1-92. The addition of this precaution is viewed as another administrative barrier to aid in preventing a violation of the technical specification restriction on crane travel with heavy loads over spent fuel.

In summary, (1) a violation of Technical Specification 3.9.7 did not occur, (2) the original procedure FHP 03-007 contained adequate guidance to preclude movement of the crane over stored fuel, (3) based on training, operator knowledge and pre-job briefings, the technical specification requirements were well understood, and (4) the procedure was enhanced to provide an additional barrier to preclude such a violation (of Technical Specification 3.9.7 specifically). WCNOC continues to maintain compliance with Technical Specification 6.8.1.a and Regulatory Guide 1.33, Appendix A.