

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

March 11, 1993

WM 93-0043

U. S. Nuclear Regulatory Commission  
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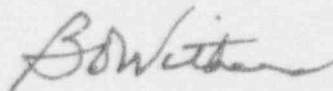
References: 1) Letter dated February 1, 1993 from A. B. Beach, NRC,  
to B. D. Withers, WCNOG  
2) Letter NA 93-0055, dated March 2, 1993, from  
R. C. Hagan, WCNOG, to NRC  
Subject: Docket No. 50-482: Response to Violation 482/9232-01

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) response to Violation 482/9232-01 which was documented in Reference 1. Violation 482/9232-01 involved the failure to follow written work instructions during the removal of Spent Fuel Cooling Pump "A" inboard bearing. In Reference 2, WCNOG requested and was granted an extension until March 15, 1993. This was based upon a telecon between Mr. Chris Kennedy of Region IV and Mr. Terry L. Riley, 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,



Bart D. Withers  
President and  
Chief Executive Officer

BDW/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 9232-01: Failure to Properly Implement Procedure

Failure to follow instructions. During the implementation of Work Request 05923-92 the mechanic used a hammer instead of a bearing puller to remove the inboard bearing from the shaft of Spent Fuel Pool Cooling Pump "A".

Finding:

"Technical Specification 6.8.1." 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. Regulatory Guide 1.33, Appendix "A", Item 9.a, states that maintenance affecting the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Step 2.16 of the work instructions for Work Request 05923-92 states that the inboard bearing of the spent fuel pool cooling pump will be removed using a bearing puller or equivalent.

Contrary to the above, on December 8, 1992, while implementing Work Request 05923-92, licensee personnel used a hammer to remove the inboard bearing from the shaft of Spent Fuel Pool Cooling Pump A instead of a bearing puller."

Admission Or Denial Of The Alleged Violation:

WCNOC denies the alleged violation.

Reason For Denial Of The Violation:

The work instruction for Work Request 05923-92 stated:

2.16 RWO Remove inboard bearing (168A) using a bearing puller or equivalent. NEVER use a hammer to drive shaft through bearing!

The step allowed the craft to use experience and training to select an appropriate tool to remove the bearing. The NRC inspector had initially read this step to say that a hammer could never be used. This was clarified with the inspector during followup discussions. The step would have stated: "NEVER use a hammer", instead of "NEVER use a hammer to drive the shaft through the bearing!", if a hammer was an unacceptable tool for use in removing the bearing.

Performance Improvement Request (PIR) MA 93-0008 was initiated to investigate the inspector's concern, identify the root cause (if any) and to recommend corrective actions for his concern. Based on the investigation the following was determined:

- 1) The bearing was damaged during normal pump operation and further bearing damage was not of concern. The bearing removal and replacement was the subject of the work instructions.
- 2) The work instructions stated to "Remove inboard bearing (168A) using a bearing puller or equivalent. NEVER use a hammer to drive shaft through bearing!" This instruction prohibits the worker from using a hammer to drive the shaft through the bearing to avoid damaging the shaft. It does not prohibit the use of a hammer to remove an already damaged bearing.
- 3) The worker followed the work instructions and did not use a hammer to drive the shaft through the bearing.
- 4) The worker used a brass hammer to remove the bearing. Thus, there was minimal risk in damaging the shaft.
- 5) The pump shaft was not damaged.
- 6) It is WCNOG's position that the substitution of a hammer in place of a bearing puller was a decision within the skill-of-the-craft, and was an equivalent and acceptable alternative to using a bearing puller for this situation.

Based on the above it was determined that the work instructions were not violated. The worker performed the bearing removal in a manner which was consistent with his knowledge and abilities.

Based on interviews conducted for PIR # MA 93-0008, the following supports the conclusion that the use of a hammer in this case was within the "skill-of-the-craft":

- 1) The Mechanical Maintenance Supervisor and the worker involved believed that the instructions as written allow for the substitute method, and that the method used is within what would be considered, "good craft practice" or "skill-of-the-craft".
- 2) Mechanical Maintenance supervision and the worker involved are in agreement that the method used was appropriate for the circumstances.
- 3) Three of the most senior Mechanical Maintenance Engineering instruction writers believe that the instructions were not misinterpreted and that the actions taken by the worker were appropriate.

- 4) The methodology used to remove the bearing was discussed with the pump manufacturer and they concurred with the methodology used in this instance.

However, in an effort to prevent future work instruction interpretation concerns the Manager Maintenance and Modifications has issued a memo to all Maintenance Department Personnel clarifying management's expectation regarding:

- 1) Expected level of detail for work instructions.
- 2) Field interpretation of work instructions.
- 3) Using skill-of-the-craft.