

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Operations

May 29, 1991

NO 91-0157

U. S. Nuclear Regulatory Commission
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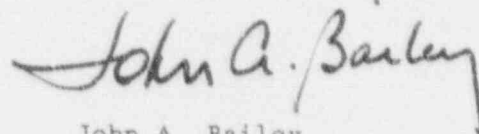
Reference: Letter dated April 29, 1991 from S. J. Collins, NRC to
B. D. Withers, WCNO
Subject: Docket No. 50-482: Response to Violation 482/9101-01

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNO) response to violation 482/9101-01 which is documented in the Reference. Violation 482/9101-01 involved the failure to make timely reports to the Nuclear Regulatory Commission in accordance with 10 CFR 50.73.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff.

Very truly yours,



John A. Bailey
Vice President
Operations

BDW/jra

Attachment

cc: L. L. Gundrum (NRC), w/a
A. T. Howell (NRC) w/a
R. D. Martin (NRC), w/a
D. V. Pickett (NRC), w/a

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STATE OF KANSAS)
) SS
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John A. Bailey, of lawful age, being first duly sworn upon oath says that he is Vice President Operations of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the content thereof; that he has executed that same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By John A. Bailey
John A. Bailey
Vice President
Operations

SUBSCRIBED and sworn to before me this 29 day of May, 1991.

Marilyn Newman
Notary Public

Expiration Date 8-4-94



Response to Violation 482/9101-01

Violation (482/9101-01): Failure to Make Timely Reports to the NRC

Finding:

The requirement of 10 CFR 50.73, "Licensing event report system," states, in part, "(a) Reportable events. (1) The holder of an operating license for a nuclear power plant (licensee) shall submit a Licensee Event Report (LER) for any event of the type described in this paragraph within 30 days after the discovery of the event...." The types of events that shall be reported are discussed in paragraph (a)(2) and include item (a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

Contrary to the above, LERs were not submitted within the 30-day limitation for the following two events:

1. LER 91-02 was submitted for a condition involving essential service water system flow rates that were lower than required to fulfill the requirements of Technical Specifications. The condition was identified as potentially reportable on June 1, 1989, as documented in Defect/Deficiency Report (DDR) 89-031. LER 91-02 was not submitted until February 26, 1991.
2. LER 91-04 was submitted for conditions involving an inoperable ventilation supply fan and inoperable ventilation damper. These conditions caused the associated emergency diesel generator to be inoperable. The licensee made the determination that the emergency diesel generators had been inoperable on December 19, 1990, as documented on DDRs 90-64 and 90-65. However, LER 91-04 was not submitted until March 8, 1991.

Reason For Violation:

NUREG 1022, Supplement No. 1, "Licensee Event Report System", Question 14.5, indicates that the "reportability" date is the date when someone decides or "discovers" that the event is reportable. The NUREG further states "If there is a significant length of time (>30 days) between event date and either the discovery or "reportability" date, the reason for the delay should be discussed in the LER text." Wolf Creek Nuclear Operating Corporation (WCNOC) submitted the above two Licensee Event Reports (LERs) within 30 days after reportability of the event was determined. However, WCNOC believes that the timeliness in making the reportability determinations was inadequate and the corrective actions discussed below addresses this area.

1. The first event, documented in Defect/Deficiency Report (D/DR) 89-031, involved a condition in which there was disparity between the Essential Service Water flow to the containment cooling units measured by differential pressure instrumentation and the flow measured by annubars. This D/DR was initiated on June 1, 1989 by Results Engineering personnel and identified that an evaluation of the instrumentation was in process. Compliance Engineering personnel suspended the reportability evaluation pending the completion of the

instrumentation evaluation. The instrumentation evaluation was completed by the end of the fourth Refueling Outage (May 1990). In January 1991, an effort was initiated to close outstanding D/DR's and the instrumentation evaluation was promptly provided and the reportability evaluation completed on January 28, 1991. The reportability evaluation was not conducted in the May 1990 time frame because Compliance Engineering personnel were not aware of the instrumentation evaluation results, and Results Engineering personnel were not aware that the D/DR was suspended pending the results of their instrumentation evaluation.

Further review of the circumstances involved did not conclusively identify a root cause. However, a contributing factor was the lack of an effective D/DR tracking/statusing system. There was no mechanism to ensure that responsible groups were aware that their input was necessary to complete a reportability evaluation. Additionally, there was no mechanism to ensure follow-up by Compliance Engineering personnel within a specified time frame.

2. The second event, documented in D/DRs 90-064 and 90-065, involved a condition in which the handswitches for the Emergency Diesel Generator (EDG) ventilation supply fans were placed in pull-to-lock and the EDG recirculation air damper was clamped in a non-safeguards position. Upon initiation of D/DR 90-065 on December 19, 1990, a meeting was conducted with personnel from Compliance Engineering, Licensing, Operations, Results Engineering and Nuclear Plant Engineering. The results of this meeting concluded that proper operation of the EDG building ventilation system was required to ensure operability of the EDGs. Based on this conclusion, this event was determined to be reportable. A submittal date of January 18, 1991 was established based on the December 19 meeting date as the start of the 30 day reporting time clock. A draft Licensee Event Report (LER) was distributed for review on January 8, 1991. During this review process, management requested an additional meeting on January 10, 1991 further discuss the event. The results of this meeting concluded that further review and testing was necessary to determine if proper functioning of the EDG building supply air system was required for operability.

Based on the subsequent meeting, the draft LER was withdrawn and a final reportability determination was suspended pending further review and testing. On February 6, 1991, when it became clear that additional review and testing could not be completed within a reasonable time frame, it was conservatively concluded that these conditions rendered the EDGs inoperable.

The reason for the delay in reporting this event was due to a change in engineering judgement concerning the operability of the EDGs. The "reportability" date was consistent with NUREG 1022 which defines the "reportability" date as when someone decides or discovers that the event is reportable.

Corrective Steps Which Have Been Taken And Results Achieved:

Procedure ADM 01-033, "Instructions Describing Reportability, Review and Documentation of Licensee Event Reports (LERs), and Defect/Deficiencies" was revised on April 24, 1991. This revision incorporated the use of an evaluation form that is forwarded to the responsible group when additional information is required to complete the reportability evaluation. The evaluation form is to be completed by the responsible group within two weeks. If the evaluation cannot be completed within the two weeks and will remain indeterminate for a significant period of time, reportability of the event will be based on engineering judgement. If sufficient information is not available to determine reportability the event will be reported.

An improved process for statusing and tracking items undergoing a reportability evaluation has been implemented. This process includes providing periodic reports to the Director Nuclear Operations and the Director Nuclear Plant Engineering.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The corrective actions discussed above should prevent recurrence.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.