

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Operations

July 24, 1991

NO 91-0198

U. S. Nuclear Regulatory Commission
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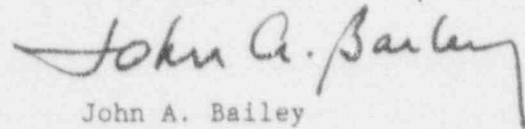
Reference: Letter dated June 24, 1991 from S. J. Collins, NRC to
B. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Violation 482/9111-01

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) response to violation 482/9111-01 which is documented in the Reference. Violation 482/9111-01 involved a failure to restore battery charger NK023 to service within the specified interval while the plant continued to operate in Mode 1.

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

Very truly yours,



John A. Bailey
Vice President
Operations

JAB/aem

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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Response to Violation 482/9111-01

Violation (482/9111-01): Violation of Technical Specification 3.8.2.1.a and 3.8.3.1.i

Finding:

Wolf Creek Generating Station Technical Specification (TS) 3.8.2.1.a requires, in part, that the 125-Volt Battery Bank NK13 and its associated Full Capacity Charger NK23 be operable in Modes 1, 2, 3, and 4. With one of the battery banks and/or full capacity chargers inoperable, restore the inoperable battery banks and/or full capacity charger to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. TS 3.8.3.1.i requires that the 125-Volt DC Bus NK03 be energized from Battery NK13 and Charger NK23.

Contrary to the above, between November 23 and 27, 1990, the plant was operated in Mode 1, with the Battery Charger NK23 inoperable. This resulted when plant operators implemented a Technical Specification interpretation that allowed the substitution of the spare battery charger (NK25) for NK23. It was subsequently determined that certain design requirements were not met when NK25 was used as a temporary replacement.

Reason For Violation:

On November 23, 1990, battery charger NK023 was taken out of service for corrective maintenance. In accordance with procedure MCE E051Q-01, "Emergency Supply to an NK Bus From Spare Charger NK025", spare battery charger NK025 was placed in service as a temporary replacement for battery charger NK023. The inspector's review of this activity identified a concern in that the technical specifications do not address the use of the spare charger. Subsequently, Wolf Creek Nuclear Operating Corporation (WCNOC) committed to submitting a license amendment request to clarify the use of spare charger NK025.

During the preparation and review of the license amendment request, a concern was identified regarding the requirements for cooling the nonvital AC switchgear room (NK025 location). A defect/deficiency report was initiated and a subsequent engineering evaluation determined that certain design requirements were not fulfilled when spare charger NK025 was utilized to power a safety-related battery bus. This event was reported to the NRC in License Event Report (LER) 90-026-00 on May 10, 1991.

WCNOC acknowledges that the plant was operated in a condition prohibited by Technical Specification 3.8.2.1.a. This condition resulted from the implementation of procedure MCE E051Q-01. As discussed in LER 90-026-00, the cause of this event was due to an error in the safety evaluation for procedure MCE E051Q-01. The purpose of this procedure was to provide the capability to maintain power on a 125V DC System bus when its normal battery charger failed by utilizing the spare charger NK025 and temporary jumper cables.

In accordance with procedure ADM 02-302, "Technical Specification Interpretations", a Technical Specification Interpretation is an approved management guidance document. A Technical Specification Interpretation is not a procedure or document that allows for reconfiguring plant components. Technical Specification Interpretation Request (TSIR) No. 004-88 was initiated during the same time that procedure MCE E051Q-01 was being developed. Based on internal discussions and reviews during the development of the procedure, it was believed that NK025 could be considered an operable full capacity batter charger so long as NK025 was energized from the same safety train as the charger it was replacing. TSIR No. 004-88 was written to provide guidance on Technical Specifications 3.8.2.1, 3.8.2.2, 3.8.3.1 and 3.8.3.2 while the procedure and associated safety evaluation provided for implementing the use of spare charger NK025. The use of spare charger NK025 was governed by procedures not a Technical Specification Interpretation.

Corrective Steps Which Have Been Taken And Results Achieved:

Procedure MCE E051Q-01 was voided on April 30, 1991. The details of this event and the need to review the applicable reference materials was discussed with personnel performing safety evaluations in Results Engineering. TSIR No. 004-88 was formally voided on April 16, 1991.

Corrective Steps Which Will Be Taken To Avoid Violations:

The Safety Evaluation Guidelines used by Results Engineering personnel have been changed to remind personnel to review support system functions and the need to review applicable reference materials. A sample of safety evaluations conducted by Results Engineering personnel from 1985 to 1990 was reviewed to ensure that incorrect conclusions in safety evaluations was not a generic problem.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved with the deletion of procedure MCE E051Q-01 on April 30, 1991 and with the completion of the review of a sample of safety evaluations on June 21, 1991.

Additional Information:

NRC Inspection Report 50-482/91-01 identified concerns with the Technical Specification Interpretation process. As a result of these concerns, procedure ADM 02-302 is being revised to require better documentation to support Technical Specification Interpretations. Additionally, the Technical Specification Interpretation review process is being enhanced by the inclusion of a representative from Nuclear Plant Engineering on the Technical Specification Interpretation Subcommittee. The revision to procedure ADM 02-302 will be completed by August 31, 1991.

As previously mentioned, WCNOG had committed to submit a license amendment request to clarify the use of spare charger NK025. As a result of this event, a license amendment request will not be submitted.