

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey  
Vice President  
Operations

July 12, 1991

AO 91-0185

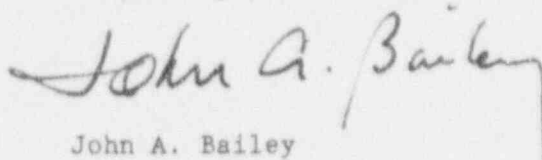
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

Subject: Docket No. 50-482: Licensee Event Report 91-009-00

Gentlemen:

The attached Licensee Event Report (LER) is being submitted pursuant to 10 CFR 50.73 (a) (2) (i) concerning a Technical Specification violation.

Very truly yours,



John A. Bailey  
Vice President  
Operations

JAB/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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P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-8331

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## LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Wolf Creek Generating Station										DOCKET NUMBER (2) 0 5 0 0 0 4 1 8 1 2 1 OF 0 4										PAGE (3) 1 OF 0 4				
TITLE (4) Technical Specification Surveillance Requirement Not Satisfied Prior To Equipment Return To Service Because Of Personnel Error																								
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)														
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES				DOCKET NUMBER(S)											
0	6	1	2	9	1	9	1	0	0	9	0	0	0	7	1	2	9	1	0	5	0	0	0	0
OPERATING MODE (9)		1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5 (Check one or more of the following) (11)																				
POWER LEVEL (10)		1		20.402(b)		20.406(a)		50.73(a)(2)(iv)		73.71(b)														
				20.406(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)														
				20.406(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vi)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)														
				20.406(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(vii)																
				20.406(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)																
				20.406(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(ix)																
				20.406(a)(1)(vi)		50.73(a)(2)(iv)		50.73(a)(2)(x)																
LICENSEE CONTACT FOR THIS LER (12)																								
NAME Merlin G. Williams - Manager Plant Support														TELEPHONE NUMBER 3 1 6 3 6 4 - 1 8 1 3 1										
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																								
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC
SUPPLEMENTAL REPORT EXPECTED (14)														EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR						
YES (If yes, complete EXPECTED SUBMISSION DATE)														X NO										

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On June 13, 1991, at approximately 1045 CDT, during a review of the Equipment Out-Of-Service Log (EOL), it was discovered that surveillance testing had not been performed within the required time interval for the Main Steam Loop 1 Low Point Drain Valve AB LV009, thereby violating Technical Specification 4.0.2. Upon discovery, the required surveillance testing was performed satisfactorily.

This event resulted from cognitive personnel errors by licensed operations personnel. Because of an oversight, the EOL was not updated after performance of a surveillance test nor was it reviewed for required surveillance tests prior to restoration of AB LV009. A contributing factor to the occurrence of these errors is the absence of an adequate program interface between the performance of surveillances, the EOL, and Clearance Orders. To preclude future occurrences, the procedures governing Clearance Orders and Surveillance Testing will be enhanced to provide an adequate interface between these programs to ensure that surveillance testing is not overlooked.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Wolf Creek Generating Station	DOCKET NUMBER (2)  0 5 0 0 0 4 8 2 9 1	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		— 0 0 9	— 0 0	0 2	OF	0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

INTRODUCTION

On June 13, 1991, at approximately 1045 CDT, during a review of the Equipment Out-Of-Service Log (EOL), it was discovered that surveillance test procedures STS AB-201, "Main Steam System Inservice Valve Test" and STS IC-627A & B, "Slave Relay Test K627 Train A (B) Steam Line Isolation", had not been performed within the required time interval for the Main Steam Loop 1 Low Point Drain Valve AB LV009 [SB-V], thereby violating Technical Specification 4.0.2. Therefore, this occurrence is being reported pursuant to 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

DESCRIPTION OF EVENT

Technical Specification 4.0.2 requires that each surveillance requirement be performed within its specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified interval. Surveillance test procedure STS AB-201, "Main Steam System Inservice Valve Test" is performed quarterly to demonstrate operability of specific Main Steam System [SB] valves. That portion applicable to valve AB LV009 verifies its full stroke time and fail-safe ability. Surveillance test procedures STS IC-627A & B, "Slave Relay Test K627 Train A (B) Steam Line Isolation" are also performed quarterly to demonstrate correct operation of Slave Relay K627 by observing equipment responses, including AB LV009, to relay actuation.

On March 21, 1991, at 0410 CST, AB LV009 was deenergized in its safeguards position for maintenance activities to correct frequent high level alarm indications for the loop 1 main steam line drain. The focus of the activities was on the level transmitter [SB-LIT] for the drain and no maintenance was performed on the valve. Because AB LV009 was out-of-service, the regularly scheduled performance of STS AB-201 and STS IC-627A & B did not include AB LV009. Also, because the allowable extended date for performance of the surveillance test was exceeded, performance of STS AB-201 and STS IC-627A & B for AB LV009 was required before the valve could be placed back in service and declared operable.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUIREMENT: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 0	9	0 0	0 3	OF	0 4

TEXT (If more space is required, use additional NRC Form 386A's) (17)

At 0933 CDT on June 12, 1991, upon completion of the maintenance activity, the Clearance Order for AB LV009 was cleared. As part of post maintenance testing, AB LV009 was cycled to verify that the valve would operate correctly. After successful manual cycling of the valve and ensuring that it remained closed, the valve was returned to service. On June 13, 1991, at 1045 CDT, during a review of the EOL, the Shift Supervisor discovered that the surveillance tests had not been performed prior to returning AB LV009 to service. Upon discovery, AB LV009 was isolated and STS AB-201 and STS IC-627A & B were performed. The tests were completed satisfactorily and AB LV009 was declared operable at 1202 CDT.

Investigation into this event revealed that the EOL had not been reviewed prior to returning AB LV009 to service. Review of the EOL entry indicated that STS IC-627A & B were listed as being required for restoration but STS AB-201 had not been listed. Further investigation revealed that the EOL had not been updated to reflect the fact that AB LV009 was out of service during the last scheduled performance of STS AB-201 and that performance of STS AB-201 was required prior to restoring AB LV009 to service.

ROOT CAUSE AND CORRECTIVE ACTIONS

This event resulted from cognitive personnel errors by licensed operations personnel. When STS AB-201 was performed, the EOL was not updated due to an oversight. When restoring AB LV009 to service, the EOL was not reviewed for required surveillances to be performed, also due to an oversight. The individuals responsible for this event have been counseled by Operations Management on the importance of maintaining an updated EOL and reviewing it prior to returning equipment to service. A contributing factor to the occurrence of these errors is the absence of an adequate program interface between the performance of surveillances, the EOL, and Clearance Orders. The Clearance Order does not prompt personnel to review the EOL for required retests. Also, the surveillance testing program does not include a process for ensuring that the EOL gets properly updated to reflect required performance of surveillance tests.

To preclude future occurrences, procedure ADM 02-100, "Clearance Order Procedure", will be revised to require that the EOL be reviewed for retests prior to restoration. This will also include a revision to the Clearance Order Form to provide a check-off block indicating that a review of the EOL had been performed. Also, procedure ADM 02-300, "Surveillance Testing", will be revised to ensure that, if applicable, the EOL is updated to reflect that a performance of the surveillance test is required. These program enhancements should provide an adequate interface between these programs to ensure that surveillance testing is not overlooked. These procedures will be revised by July 30, 1991.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-30), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

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Wolf Creek Generating Station

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

ADDITIONAL INFORMATION

While the valve was in service without prior performance of the required surveillance tests, the unit was operated in Mode 1, Power Operation, at 100 percent reactor power. Throughout this period the valve remained in its normally closed position and subsequent surveillance testing verified that the valve would have performed its design function. There was no threat to the health and safety of the public.

There have been other occurrences where surveillance intervals have been exceeded, however none have been attributed to overlooking performance of a surveillance test prior to returning equipment to service.