

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey  
Vice President  
Operations

September 25, 1991

NO 91-0246

U. S. Nuclear Regulatory Commission  
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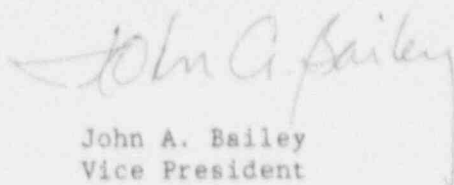
Reference: NO 91-0220, dated August 19, 1991 from J. A. Bailey,  
WCNOC to NRC  
Subject: Docket No. 50-482: Submittal of Corrected Licensee  
Event Report 91-011-01

Gentlemen:

The purpose of this letter is to submit revision 1 of Licensee Event Report 91-011. Revision 0 was submitted with an incorrect report date (NRC Form 366, item 7). The report date shown on revision 1 corresponds with the date LER 91-011 was actually submitted.

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

JAB/jra

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

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# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Wolf Creek Generating Station	DOCKET NUMBER (2) 050004821	PAGE (3) of 06
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TITLE (4) Late Surveillance Test Performance Caused By Error In Completing Status Chart

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	DOCKET NUMBER (5)
05	31	91	91	011	01	08	19	91	050004821

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (Check one or more of the following) (11)									
	20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)
	20.405(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)			73.71(c)
	20.405(a)(1)(ii)			50.36(c)(2)			50.73(a)(2)(vi)			OTHER (Specify in Abstract below and in Test, NRC Form 366A)
	20.405(a)(1)(iii)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)			50.73(a)(2)(vii)(A)			
	20.405(a)(1)(iv)			50.73(a)(2)(ii)			50.73(a)(2)(vii)(B)			
20.405(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(x)				

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME Merlin G. Williams - Manager Plant Support		AREA CODE 316 364 - 8831	

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

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO				

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

On July 18, 1991, at approximately 1121 CDT, it was determined that the quarterly Component Cooling Water System (CCW) inservice valve test had not been completely performed during the second quarter of 1991, causing inoperability of two trains of CCW and certain Containment Isolation Valves, which required entry into Technical Specification (TS) 3.0.3. The required test was performed on the "A" Train valves at 1158 CDT. The "A" Train was declared operable and TS 3.0.3 was exited. At 1208 CDT, it was recognized that the "A" Train was inoperable because of preventative maintenance activities, and the requirements of TS 3.0.3 were still applicable. Testing of the "B" Train valves was completed at 1210 CDT, restoring one CCW train to operable status, and TS 3.0.3 was exited. At 1428 CDT, the "A" Train was restored to operable status. The individual involved in the premature exit from TS 3.0.3 has been reminded of the importance of not allowing rapid evolutions to distract from knowledge of plant status.

This event occurred because the Control Room surveillance tracking chart was improperly marked after partial performance of the surveillance test on May 14, 1991. Proper use of the chart has been discussed with the individual involved. As a second check to ensure surveillances are completed, scheduling personnel will independently verify surveillance test completion.

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Wolf Creek Generating Station	0500048291	-	011	-	0102 of 06

TEXT (If more space is required, use additional NRC Form 368A's) (17)

**INTRODUCTION**

On July 18, 1991, at approximately 1121 CDT, it was determined that surveillance test procedure STS EG-201, "Component Cooling Water System Inservice Valve Test", was only partially performed during the second quarter of 1991. This surveillance test is required to be performed on a quarterly basis per Technical Specification 4.0.5 to demonstrate operability of the Component Cooling Water System (CC) and of the Containment Isolation Valves associated with the Component Cooling Water System. The failure to perform surveillance test procedure STS EG-201 within the required time-frame 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 4.0.5 requires, in part, that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. The Technical Specifications further state that each surveillance requirement must be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the stated surveillance interval.

In accordance with these requirements, STS EG-201, "Component Cooling Water Inservice Valve Test," was scheduled to be performed on May 7, 1991, with a late date of May 30, 1991. Because testing on one of the valves, EG HV-62, Component Cooling Water Return from the Reactor Coolant System, in this surveillance test requires a containment entry, the surveillance test routing sheet contained a note that the testing of this valve should be conducted during the next scheduled containment entry. Containment entries normally are conducted on alternate Tuesdays. In this instance, the next containment entry was scheduled for May 14, 1991. The surveillance test routing sheet and procedure were then routed to the Control Room for performance of the test.

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In late May, 1991, the computerized surveillance scheduling program flagged this surveillance as having the potential for becoming overdue - i.e., a recent completion date had not been entered into the computer data base. Surveillance scheduling personnel then verified that performance of the surveillance had been signed off as complete in the RI Status Chart. The RI Status Chart is used by Control Room personnel to track required surveillances that are performed on a monthly or longer frequency. Surveillance personnel concluded that the completed surveillance test procedure was still in the review process and had not yet been routed to them. It was not unusual for documentation to remain in the review process for a period of time following test completion.

On July 18, 1991, when preparing a surveillance schedule for a subsequent week, surveillance personnel attempted to locate a copy of the completed surveillance. This effort identified that surveillance test STS EG-201 had been performed for the valve located inside containment on May 14, 1991, but evidence of performance of the balance of the test could not be located. At 1121 CDT, the Shift Supervisor was notified of the necessity to perform surveillance test STS EG-201. Upon being notified that the surveillance had been missed, the Shift Supervisor declared both Component Cooling Water Trains inoperable. Technical Specification 3.7.3 requires that two independent Component Cooling Water loops be operable and does not provide an Action Statement for inoperability of more than one loop. Consequently, the unit entered Technical Specification 3.0.3 at 1121 CDT. At 1123 CDT, performance of surveillance test STS EG-201 was begun on the valves which had not been tested on May 14, 1991.

At 1158 CDT, the portion of STS EG-201 applicable to the "A" Train of the Component Cooling Water System was completed satisfactorily, and the "A" Train was declared operable. Technical Specification 3.0.3 was exited, and entry was made into the Technical Specification 3.7.3 Action Statement for inoperability of one Component Cooling Water loop. This Action Statement allows for inoperability of one Component Cooling Water loop for a maximum of 72 hours. The required testing of the "B" Train valves was then begun.

At 1208 CDT, the Shift Supervisor remembered that the "A" Train of the Component Cooling Water System was still inoperable while reviewing the Equipment Out Of Service/Action Statement Summary Log to close out the TS 3.0.3 entry. The pump room cooler associated with the "A" Train had been removed from service at 0523 CDT on July 18, 1991, for preventative



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TEXT (If more space is required, use additional NRC Form 365A's) (17)

maintenance activities. Consequently, the exit from Technical Specification 3.0.3 at 1158 CDT had been premature, and the requirements of Technical Specification 3.0.3 were still applicable. At 1210 CDT, testing of the "B" Train Component Cooling Water System valves was completed and the "B" Train was declared operable, allowing the unit to exit Technical Specification 3.0.3. The Action Statement of Technical Specification 3.7.3 was still in effect as the "A" Train was still inoperable.

At 1428 CDT, the preventative maintenance on the room cooler for the "A" Train of the Component Cooling Water System was completed, the "A" Train was declared operable and Technical Specification 3.7.3 was exited.

Subsequent review of the test data determined that the recorded stroke times of two valves, EG TV-29 and EG TV-30, Component Cooling Water "A" and "B" Heat Exchanger Temperature Control Valves (CC-TCV), were significantly shorter than previously recorded stroke times. The valve stroke times were again recorded on July 19, 1991, and were satisfactory. This discrepancy in the July 18 test data did not cause inoperability of the Component Cooling Water System.

Further evaluation of this event revealed that failure to perform the surveillance test in its entirety also impacted Technical Specification 3.6.1.1, which requires that specified containment isolation valves be maintained operable with appropriate isolation times, as listed in the Technical Specification. Because surveillance test STS EG-201 verifies isolation times of the containment isolation valves associated with the Component Cooling Water System, entry should have been made into the Action Statement of Technical Specification 3.6.1.1 along with entry into Technical Specification 3.7.3.

**ROOT CAUSE AND CORRECTIVE ACTIONS**

Review of this event identified several factors which contributed to the failure to perform the surveillance test procedure in its entirety. Normally, the portion of the surveillance test for the majority of the valves is performed on or near the scheduled due date. The partially completed surveillance test is then held in the Control Room until the next scheduled containment entry, when the remainder of the test is performed. The performance of the test is then initialed on the RI Status Sheet and the documentation is routed through the review process.

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On May 14, 1991, the R1 Status Chart was incorrectly initialed to signify that surveillance test STS EG-201 had been completed, when in fact only a partial test had been performed. This cognitive personnel error by a licensed operator has been attributed to a lack of detailed understanding of the R1 Status Charts. Although fully qualified for the position of Supervising Operator, this was the first instance that the individual had fulfilled the duties of Supervising Operator, such as maintenance of the R1 Status Charts. As a result, he initialed performance of surveillance test procedure STS EG-201 when only a partial test had been performed. The proper usage of the R1 Status Charts has been discussed with the individual. This report will be placed in Operations Required Reading by August 31, 1991, to re-emphasize to all personnel qualified to serve as Supervising Operator the importance of properly updating the R1 Status Charts.

Additionally, review of this event identified the need for a more positive means of verification that a surveillance test has been completed. Accordingly, the process by which the Surveillance Coordinator is notified of completion of a surveillance has been modified such that he now independently verifies its completion without reliance on the R1 Status Chart maintained by Control Room personnel. If unable to confirm that an R1 surveillance is complete at least two days prior to its late date, the Surveillance Coordinator will notify Operations management to ensure that prompt management attention is focused on the issue. Because surveillances tracked on the R1 Status Charts have performance intervals of one month or longer, this change will ensure that surveillance performance discrepancies will be detected and resolved prior to the surveillance becoming late.

As an overall enhancement to the surveillance scheduling and tracking program, the Surveillance Coordinator's Senior Reactor Operator License has recently been made inactive. Because the Surveillance Coordinator is no longer maintaining an active license, he is able to devote full time to surveillance scheduling and tracking. This change enhances the supervisory oversight of the overall program administration.

The premature exit from Technical Specification 3.0.3 and failure to enter Technical Specification 3.6.1.1 were also caused by cognitive personnel error by licensed personnel. However, the individual detected his error in exiting Technical Specification 3.0.3 during review of the Equipment Out-of-Service and Action Statement Summary Logs, and re-entered Technical Specification 3.0.3. The failure to log entry into Technical Specification 3.6.1.1 had no significant impact on the course of this event because the actions required by Technical Specifications for containment inoperability are bounded by the actions of Technical Specification 3.0.3. This individual has been reminded of the importance of not allowing rapid evolutions to distract from knowledge of plant status.

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The shorter than normal recorded stroke times for the Component Cooling Water Heat Exchanger Temperature Control Valves were the result of incomplete stroking of the valves. In order for the valves to stroke fully, the temperature setpoint must be increased. On July 18, 1991, it is believed that the setpoint may not have been increased sufficiently to allow the valve to fully stroke. This occurrence has been attributed to an absence of specific procedural instructions, as the surveillance test procedure required "varying the temperature setpoint." This lack of concise instructions became a major factor in this event because of the urgency involved in entering Technical Specification 3.0.3. Surveillance test procedure STS EG-201 has been revised to specify a temperature setpoint of 150 degrees to ensure the valves are stroked fully during surveillance testing.

**ADDITIONAL INFORMATION**

During the time period of this event, the unit was operating in Mode 1, Power Operations, at 100 percent rated thermal power. Based on the fact that the affected valves performed satisfactorily in July, it is concluded that the failure to perform the surveillance test did not compromise the ability of the valves to function as required.

Licensee Event Report 91-009 discusses an event in which a scheduled surveillance test was not performed prior to restoring a piece of equipment to operable status. That event was attributed to a lack of interface between the Equipment Out-of-Service and Surveillance Testing programs. Corrective actions discussed in that event are not applicable to this event.

Licensee Event Report 90-004-00 discusses an event in which a scheduled surveillance test was not performed because of a scheduling error. The performance date of a surveillance was not entered in the computerized surveillance tracking system and consequently no new "due date" for the surveillance was calculated. Corrective actions for that event included proceduralizing a requirement to check the Past Due Surveillance Inquiry Report on a weekly basis. The event discussed in this report was initially identified by a review of the Past Due Surveillance Inquiry Report. However, when the discrepancy was identified, personnel relied on the RI Status Chart to indicate that the surveillance had been performed. The corrective actions discussed in this report will ensure that discrepancies identified during these reviews receive adequate resolution.