

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

September 27, 1991

WM 91-0135

U. S. Nuclear Regulatory Commission
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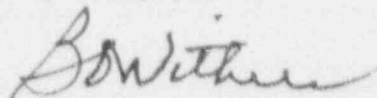
Reference: Letter dated August 28, 1991 from S. J. Collins, NRC,
to R. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Violation 482/9118-01

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) response to violation 482/9118-01 which is documented in the Reference. Violation 482/9118-01 involved the failure to follow an approved procedure.

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

Very truly yours,



Bart D. Withers
President and
Chief Executive Officer

BDW/jra

Attachment

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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Response to Violation 482/9118-01

Violation (482/9118-01) Failure to Follow an Approved Procedure

Finding.

Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering those activities recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. RG 1.33 requires, in part, that procedures for operation of safety-related pressurized water reactor systems be implemented. This requirement is implemented, in part, by Wolf Creek Generating Station (WCGS) System Operating Procedure CKL EJ-120, "RHR Normal System Lineup." Page 2 of CKL EJ-120 requires that Valves EJ-V016 and EJ-V012 be open.

Contrary to the above, on July 14, 1991, the "B" residual heat removal pump discharge pressure transmitter isolation Valve EJ-V016 and pump suction pressure indicator isolation Valve EJ-V012 were confirmed to be in the closed position. These valves were apparently manipulated during the performance of Surveillance Test Procedure STS EJ-100B, Revision 8, "RHR Inservice Pump B Test," on June 19, 1991. With EJ-V016 closed, "RHR B DISCH PRESS HI" annunciator was rendered inoperable.

Reason for Violation:

A review of the available documentation associated with this event did not conclusively identify the reason for the violation. Procedure CKL EJ-120, "RHR Normal System Lineup", performed on November 11, 1988 verified that valves EJ-V012 and EJ-V016 were open. The satisfactory performance of procedure STS EJ-100B, "RHR System Inservice Pump B Test" on June 19, 1991 indicates that the two valves were closed on or after this date. A review of the work history on EJ-V012 and EJ-V016 was performed and identified that no work had been performed on these valves after June 19, 1991. A review of the calibration records for the RHR System Suction Pressure gauge EJ PI-602 and RHR System Discharge Pressure transmitter EJ PT-615 identified that calibration of the instruments had not been performed after June 19, 1991. From discussions with Operators, Instrument and Control (I&C) technicians and Results Engineering personnel involved, Wolf Creek Nuclear Operating Corporation (WCNOC) was unable to determine the reason that these valves were in the closed position.

Inspection Report 50-482/91-18 states, "Apparently personnel performing this surveillance routinely close these valves even though Procedure STS EJ-100B does not require them to be manipulated." The standard practice at Wolf Creek Generating Station is to leave the instrument root valves in the open position. If additional test pressure gauges are required to perform the surveillance, the procedure provides guidance for installing the gauge on the manifold utilizing the manifold drain valves. Authorization from the Control Room is necessary if a valve is to be manipulated that is not specifically allowed by procedure.

Corrective Steps Which Have Been Taken And Results Achieved:

Upon notification to Control Room personnel, a operator confirmed the position of valves EJ-V012 and EJ-V016 and the valves were subsequently opened. Additionally, operators verified that the similar train "A" residual heat removal root valves were open.

A Programmatic Deficiency Report (PDR) was initiated on July 14, 1991 to evaluate this event.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

A copy of the PDR was placed in Operations, I&C and Results Engineering required reading to remind personnel of the philosophy regarding operation of valves and equipment in the plant. A letter from the Deputy Director Plant Operations was issued to station personnel as a result of an unrelated event to reemphasize that Operations personnel are the only individuals authorized to manipulate valves and operate equipment in the plant unless specifically authorized by procedure or authorized by the Control Room.

The details of this event will be included in licensed operator and nuclear station operator requalification training cycle 92-1 on plant/industry events. Requalification training cycle 92-1 is scheduled to begin on November 11, 1991. Additionally, this event will be included in General Employee Training (GET) requalification training for 1992.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.