

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Operations

July 18, 1991

NO 91-0187

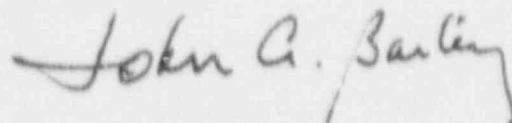
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Subject: Docket No. 50-482; Licensee Event Report 91-010-00

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/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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S FDR

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, 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 1 OF 0 4

PAGE (3)

TITLE (4): Containment Emergency Escape Air Lock Hatch Closed Without Having The Required Leak Rate Test Performed Because Of Inadequate Administrative Controls

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)	
05	09	91	91	010		07	18	91		0 5 0 0 0 0	
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)								
1			2. 402(b)			20 405(c)			50 73(a)(2)(iv)		
POWER LEVEL (10)			20 405(a)(1)(i)			50 36(e)(1)			50 73(a)(2)(iv)		
016.10			20 405(a)(1)(ii)			50 36(e)(2)			50 73(a)(2)(iv)		
			20 405(a)(1)(iii)			X 50 73(a)(2)(i)			50 73(a)(2)(iv)(A)		
			20 405(a)(1)(iv)			50 73(a)(2)(ii)			50 73(a)(2)(iv)(B)		
			20 405(a)(1)(v)			50 73(a)(2)(iii)			50 73(a)(2)(iv)		

LICENSEE CONTACT FOR THIS LER (12)

NAME

Merlin G. Williams - Manager Plant Support

TELEPHONE NUMBER

AREA CODE

3 1 6 3 6 4 - 8 8 3 1

COMPLETE ONE LINE FOR EACH COMPLIMENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)

X NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

ABSTRACT (Limit to 1400 words. - x Approximately fifteen single space typewritten lines) (16)

On June 18, 1991, it was determined that the outer hatch to the containment emergency escape air lock had been opened and closed on May 9, 1991 under a Security System Work Request (SSWR). The required emergency escape air lock seal test was not performed following closure contrary to Technical Specification 3.6.1.3 which requires, in part, demonstration of containment air lock operability within 72 hours following each closing. Following discovery, the required emergency escape air lock seal test was performed satisfactorily.

The root cause of this event was the lack of administrative controls involving the use of SSWRs. Signs have been placed on the containment emergency escape air lock informing personnel that air lock seal tests are required after each closing. Also, the procedure governing the issuance of SSWRs will be enhanced to ensure that appropriate reviews are conducted before troubleshooting associated with the security system are allowed to proceed.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 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 1 0 4 8 2	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 1	— 0 1 0	— 0 0	0 2	OF 0 4

TEXT (If more space is required, use additional NRC Form 308A's) (17)

INTRODUCTION

On June 18, 1991, it was determined that the outer hatch to the containment emergency escape air lock had been opened and closed without subsequent performance of the required emergency escape air lock seal test. Failure to perform this test is in violation of Technical Specification 3.6.1.3 which requires, in part, demonstration of containment air lock operability within 72 hours following each closing. Therefore, this event 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

On May 9, 1991, at approximately 0845 CDT, a Health Physics Technician checked out the locked High Radiation Area key from Security for the containment emergency escape air lock vestibule [Figure 1] and subsequently notified the Control Room (The Control Room is also notified by Security whenever a High Radiation Area key is checked out and returned to Security). The key was used to allow Electrical Maintenance personnel, while working under a Security System Work Request (SSWR), to troubleshoot a continuous alarm on Security Door 22021. Previous troubleshooting had narrowed the problem to cables within the emergency escape air lock vestibule. These cables are routed through the emergency escape air lock and provide intrusion alarms on security doors. Electrical Maintenance personnel, unable to diagnose the problem outside the emergency escape air lock, entered the unlocked emergency escape air lock from the vestibule at approximately 0910 CDT and determined that cables inside the air lock were faulted. The outer hatch was closed and the locked High Radiation Area was exited and the key returned to Security. A plant work request was then initiated to repair the faulted cables.

On June 18, 1991, during work schedule development discussions it was noted that a leak rate test is required when an emergency escape air lock hatch is opened and closed. Results Engineering was contacted and confirmed to Electrical Maintenance that a leak rate test is required following an emergency escape air lock entry. At 1345 CDT, the Control Room was notified that Electrical Maintenance had entered and exited the air lock on May 9, 1991 without subsequent performance of a leak rate test. Technical Specification 3.6.1.3 was then entered for an inoperable containment air lock hatch.

LICENSEE EVENT REPORT (LER)
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FACILITY NAME (1) Wolf Creek Generating Station	DOCKET NUMBER (2) 0500048291-010-0003 OF 04	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			

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

Technical Specification 3.6.1.3 requires, in part, demonstration of containment air lock operability within 72 hours following each closing. With a containment air lock hatch inoperable, the operable air lock hatch must be maintained closed and the inoperable air lock door must either be restored to operable status within 24 hours or the operable air lock hatch must be locked closed. Otherwise, the unit must be placed in at least Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours. Procedure STS PE-020, "Emergency Escape Lock Seal Test", was performed satisfactorily at 1448 CDT and Technical Specification 3.6.1.3 was exited at that time.

ROOT CAUSE AND CORRECTIVE ACTIONS

The root cause of this event was the lack of administrative controls involving the use of SSWRs. The SSWR did not provide a mechanism for the work activities to be documented or allow the Shift Supervisor to review the SSWR following completion. SSWRs are used to primarily work on malfunctioning alarm systems associated with the security system and are kept safeguarded in the Security Building. These work requests are treated as safeguards information and therefore a different administrative process is utilized.

In order to prevent recurrence of this situation, signs have been placed on the emergency escape lock informing personnel that air lock seal tests are required after each closing and that the Control Room is to be contacted. Also, the procedure governing the issuance of SSWRs will be revised to enhance the approval and review process. This revision will provide a means for documenting work activities under a SSWR for Power Block equipment. It will also require the Shift Supervisor to authorize work under a SSWR for Power Block equipment and to review the activity following completion. These administrative changes will be completed by September 1, 1991.

ADDITIONAL INFORMATION

While the Emergency Escape Lock was considered inoperable the unit was operated in Mode 1, Power Operation, from 60 percent to 100 percent reactor power. Although the outer hatch of the emergency escape air lock was opened, the integrity of containment was maintained by the inner hatch, which remained closed throughout this event.

Licensee Event Report 86-025-00 describes a situation in which multiple containment entries were made during a planned outage without having the containment air lock seal test performed at the frequency required by Technical Specifications. The corrective actions taken in response to this occurrence addressed specific circumstances and had no correlation with this event.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATIONESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS
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FACILITY NAME (1)

DOCKET NUMBER (2)

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PAGE (3)

YEAR SEQUENTIAL
NUMBER REVISION
NUMBER

Wolf Creek Generating Station

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TEXT (If more space is required, use additional NRC Form 285A's) (17)

FIGURE 1 - CONTAINMENT EMERGENCY ESCAPE AIR LOCK

CONTAINMENT

EMERGENCY ESCAPE AIR LOCK VESTIBULE

INNER
HATCHEMERGENCY
ESCAPE
AIR
LOCKOUTER
HATCHDOOR
22021

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