

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey  
Vice President  
Operations

March 30, 1992

NO 92-0103

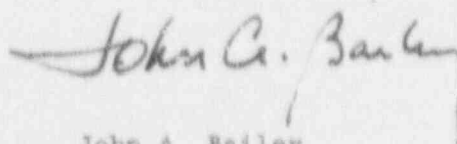
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station PL-137  
Washington, D. C. 20555

Subject: Docket No. 50-482; Licensee Event Report 92-005-00

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: A. T. Howell (NRC), w/a  
R. D. Martin (NRC), w/a  
G. A. Pick (NRC), w/a  
W. D. Reckley (NRC), w/a

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# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Wolf Creek Generating Station</b>										DOCKET NUMBER (2) <b>0 5 0 0 0 4</b>				PAGE (3) <b>1 of 013</b>																										
TITLE (4) <b>Failure To Verify Two Containment Penetration Drain Valves Were Locked Results In Violation Of Technical Specification 4.6.1.1.a</b>																																								
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 (9)																															
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THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (Check one or more of the following) (11) <table border="0" style="width: 100%;"> <tr> <td style="width: 15%;">OPERATING MODE (9) <b>3</b></td> <td style="width: 25%;">20.402(b)</td> <td style="width: 25%;">20.405(e)</td> <td style="width: 35%;">50.73(a)(2)(iv)</td> <td style="width: 20%;">73.71(b)</td> </tr> <tr> <td rowspan="4">POWER LEVEL (10) <b>0 0 0</b></td> <td>20.405(a)(1)(i)</td> <td>50.36(c)(1)</td> <td>50.73(a)(2)(v)</td> <td>73.71(c)</td> </tr> <tr> <td>20.405(a)(1)(ii)</td> <td>50.36(c)(2)</td> <td>50.73(a)(2)(vi)</td> <td rowspan="3">OTHER (Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td>20.405(a)(1)(iii)</td> <td><input checked="" type="checkbox"/> 50.73(a)(2)(i)</td> <td>50.73(a)(2)(vii)(A)</td> </tr> <tr> <td>20.405(a)(1)(iv)</td> <td>50.73(a)(2)(ii)</td> <td>50.73(a)(2)(vii)(B)</td> </tr> <tr> <td></td> <td>20.405(a)(1)(v)</td> <td>50.73(a)(2)(iii)</td> <td>50.73(a)(2)(viii)</td> <td></td> </tr> </table>																OPERATING MODE (9) <b>3</b>	20.402(b)	20.405(e)	50.73(a)(2)(iv)	73.71(b)	POWER LEVEL (10) <b>0 0 0</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 Text, 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)(viii)	
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LICENSEE CONTACT FOR THIS LER (12)																																								
NAME <b>Steve G. Wideman - Supervisor Licensing</b>										TELEPHONE NUMBER AREA CODE <b>3 1 6</b> NUMBER <b>3 6 4 - 8 8 3 1</b>																														
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																												
<input type="checkbox"/> 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 February 27, 1992, at approximately 1430 CST, Control Room operators were notified that containment penetration vent and drain valves may not have been included in surveillance test procedure STS GP-007, "Containment Penetration Isolation Verification", as required. A subsequent evaluation concluded that valves EJVI87 and EJVI89, Containment Recirculation Sump to Post-Accident Sampling System Test Connection and Drain Valves, had not been verified locked closed as required by Technical Specification Surveillance Requirement 4.6.1.1.a. The valves were subsequently verified locked closed on March 16, 1992.

The root cause of this event was inadequate attention to detail when preparing surveillance test procedure STS GP-007 prior to plant startup. Surveillance test procedure STS GP-007 has been revised to ensure that valves EJVI87 and EJVI89 are verified locked closed in accordance with the requirements of Technical Specification Surveillance Requirement 4.6.1.1.a. As a result of the evaluation, no other violations of Technical Specification Surveillance Requirement 4.6.1.1.a have been identified.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (3)			PAGE (3)
Wolf Creek Generating Station	0500048292	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	02 of 03
			005	00	

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

**INTRODUCTION**

On February 27, 1992, at approximately 1430 CST, Control Room operators were notified that containment penetration vent and drain valves may not have been included in surveillance test procedure STS GP-007, "Containment Penetration Isolation Verification", as required. A subsequent evaluation concluded that two containment penetration test connections and drain valves had not been verified locked closed as required by Technical Specification Surveillance Requirement 4.6.1.1.a. Therefore, this event is being reported pursuant to 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

**DESCRIPTION OF EVENT**

Technical Specification 3.6.1.1 requires that primary containment integrity be maintained while the unit is in Mode 1, Power Operation, through Mode 4, Hot Shutdown. Without primary containment integrity, containment integrity must be restored within one hour or the unit placed in at least Hot Standby within the next six hours and in Cold Shutdown within the following 30 hours. Technical Specification Surveillance Requirement 4.6.1.1.a requires primary containment integrity to be demonstrated at least once per 31 days by verifying that all penetrations not capable of being closed by operable containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except as provided in Table 3.6-1 of Technical Specification 3.6.3. Additionally, Technical Specification Surveillance Requirement 4.6.1.1.a excludes valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed or otherwise secured in the closed position. These penetrations must be verified closed during each Cold Shutdown with the exception that such verification need not be performed more often than once per 92 days.

A Licensee Event Report (LER) received from another licensee as part of the Industry Technical Information Program initiated a review of the event for applicability to Wolf Creek Generating Station. The LER concerned a failure to verify that a containment penetration vent valve was locked closed as required by Technical Specifications because of an incorrect locked valve list. As a result of the initial review of this LER, it was determined that containment isolation valves may not have been included in surveillance test procedure STS GP-007, "Containment Penetration Isolation Verification", as required. Subsequently, on February 27, 1992, at approximately 1430 CST, with the plant in Mode 3, Hot Standby, Control Room operators were notified of the initial review findings.

LICENSEE EVENT REPORT (LER)  
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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (3)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Wolf Creek Generating Station	0500048292	005	000	3	3 of 3

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

Updated Safety Analysis Report (USAR) Section 6.2.4.4 states, in part, that all manual valves which serve as containment isolation valves are locked or sealed closed. Also, manual valves in the process lines are subject to the surveillance requirements of Technical Specification 4.6.1.1.a while manual valves serving as vents, drains and test connections within the isolation valve envelope are subject to administrative procedures to ensure that they are in the proper position.

A subsequent evaluation of the results from the initial review concluded that although vents, drains, and test connections need not be included in surveillance test procedure STS GP-007 to meet Technical Specification Surveillance Requirement 4.6.1.1.a, the vents, drains, and test connections must be administratively controlled in a manner which ensures proper positioning and inclusion of vent, drain and test connections in administrative procedure ADM 02-102 satisfies the requirements of administrative control. However, this evaluation concluded that valves EJVI87 and EJVI89 [BP-V], Containment Recirculation Sump to Post-Accident Sampling System Test Connection and Drain Valves, had not been included in surveillance test procedure STS GP-007 resulting in a failure to satisfy Technical Specification Surveillance Requirement 4.6.1.1.a. Valves EJVI87 and EJVI89 are unique in that they do not satisfy the exclusion of USAR Section 6.2.4.4 because they do not fall within the isolation valve envelope.

**ROOT CAUSE AND CORRECTIVE ACTIONS**

The root cause of this event was inadequate attention to detail when preparing the surveillance test procedure prior to plant startup. Valves EJVI87 and EJVI89 were verified locked closed on March 16, 1992. Surveillance test procedure STS GP-007 has been revised to ensure that valves EJVI87 and EJVI89 are verified locked closed pursuant to the requirements of Technical Specification 4.6.1.1.a. As a result of the evaluation, no other violations of T/S Surveillance Requirement 4.6.1.1.a have been identified.

**ADDITIONAL INFORMATION**

Although not verified in surveillance test procedure, the screwed caps downstream of valves EJVI87 and EJVI89 were installed prior to initial start-up to provide a barrier should the valves have been inadvertently opened. Valves EJVI87 and EJVI89 are verified closed and capped following each local leak rate test. Since the valves were closed and capped, the valves were performing their containment isolation function. Therefore, there was no threat to the health and safety of the public.

There have been no previous similar occurrences.