

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Operations

February 5, 1992
NO 92-0045

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

Reference: 1) Letter dated January 2, 1992, from A. B. Beach,
NRC, to B. D. Withers, WCNOG
2) Letter WM 91-0172 dated December 5, 1991 from
B. D. Withers, WCNOG to NRC
Subject: Docket No. 50-482: Response to Request for Additional
Information Concerning Violation 482/9126-02 and
9126-03

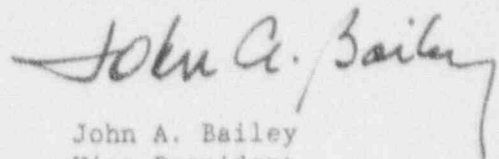
Gentlemen:

The purpose of this letter is to provide additional information concerning violation 482/9126-02 and 9126-03 as requested in Reference 1.

Violation 482/9126-02 concerned the failure to restore a damper following a loss of instrument air. Violation 482/9126-03 concerned the failure to control work practices resulting in both trains of two systems being inoperable.

The attachment to this letter provides Wolf Creek Nuclear Operating Corporation's (WCNOG) response to the request for additional information. If you have any questions concerning this matter, please contact me or Mr. S. G. Wideman of my staff.

Very truly yours,



John A. Bailey
Vice President
Operations

JAB/aem

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

Response to Request for Additional Information

Request: With regard to Violation 482/9126-02, we require additional information about the adequacy of Offnormal Procedure OFN 00-019, Revision 8, "Loss of Instrument Air," to identify and respond to this and similar events. We also request that you assess the adequacy of the work controls for the work activity which resulted in isolating the air line.

Response: Procedure OFN 00-019, "Loss of Instrument Air", was generated for responding to a complete loss of the instrument air system. The procedure provides guidance in the event of a loss of air to check the air compressors, ensure the service air system headers is isolated, check the air dryers and stabilize pressurizer level. If the leak is located in a specific instrument air header, the procedure provides the valve number and location for isolation of the header. Additionally, the procedure provides as a reference a list of valves by system and their failure position on a loss of air for assisting in restoration.

Procedure OFN 00-019, was not intended to provide specific actions to be taken when air is lost downstream of branch isolation valves. To try to address every individual loss of air is not appropriate. The procedure has been utilized in the past when a train of air dryers failed or as part of a maintenance activity when the entire instrument header was depressurized. WCNOC believes the OFN 00-019 was adequate for responding to the October 2, 1991 event. However, a document identifying the loads off branch isolation valve would be beneficial to the operators for restoration of portions of the instrument air system during maintenance outages. The Operations Department and system engineer will implement a program for developing a controlled document identifying the loads by the end of April 1992.

WCNOC reviewed the work controls associated with the activity which resulted in isolating the air line and found them to be adequate. During the performance of procedure STS PE-047B, air was found leaking on the regulator for valve KA FV-29. Work Request 04506-91 was initiated on September 27, 1991 to repair the leaking regulator. On October 2, 1991, and Instrumentation and Control technician received permission from the Supervising Operator in the Control Room to work on the regulator. The technician indicated to the Control Room that KA FV-29 might close when the work was being performed. When the work was completed and instrument air restored, the Control Room failed to consider the affect upon the containment purge system and failed to utilize OFN 00-019 for restoration.

Request: In general, we found your response to Violation 482/9126-03 to be adequate. In reviewing your corrective actions though, additional information is needed to determine how you will assess the adequacy of maintenance shift turnovers. We also require information on the guidance provided to personnel responsible for reviewing work instructions to determine which activities should be governed by approved procedures and whether the work instructions will be reviewed prior to being implemented again.

Response: The need for effective shift turnovers has been discussed with Maintenance and Modifications Department Supervisors. This discussion stressed the importance of proper communication of work in progress and equipment status during shift turnovers. Electrical and Mechanical Maintenance personnel maintain a daily work log which is used to clarify priorities between shifts and is reviewed daily by Electrical and Mechanical Maintenance Supervisors. Therefore, the adequacy of maintenance shift turnovers is monitored by periodic attendance of supervisors at various shift turnovers and a review of the daily work log.

As identified in Reference 2, an interim checklist was developed for maintenance personnel's use in system restoration to ensure equipment is restored to its proper configuration prior to signing off that the work is complete. For corrective work request packages, this restoration guidance will be provided in ADM 08-206 "Corrective Maintenance" by February 28, 1992. Procedure ADM 08-202, "Planning and Scheduling Preventative Maintenance Tasks" provides specific guidance for determining those preventative work activities that should be governed by approved procedures. During the review of work package instructions as discussed in Reference 2, the guidance in ADM 08-202 or the interim checklist is utilized to strengthen the restoration process in the work instructions or in the development of a procedure. For preventative maintenance activities, the need to strengthen the restoration process in work instructions or the development of a procedure is performed prior to the performance of the activity.