

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Neil S. "Buzz" Carns
Chairman, President and
Chief Executive Officer

August 16, 1996

WM 96-0083

U. S. Nuclear Regulatory Commission
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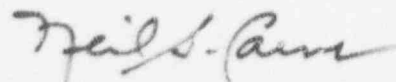
Reference: Letter dated July 5, 1996, from J. E. Dyer, NRC,
to N. S. Carns. WCNOG
Subject: Docket No 50-482: Response to Notice of Violation
50-482/9611-01, -02, -03

Gentlemen:

This letter transmits Wolf Creek Nuclear Operating Corporation's (WCNOG) response to Notice of Violation 50-482/9611-01, -02, -03. The first violation identified that engineering personnel failed to address all credible failure modes for the packing in a safety classification analysis that downgraded the Turbine-Driven Auxiliary Feedwater Pump packing to nonsafety-related. The second violation identified a failure to complete required evaluations prior to installing nonsafety-related packing in Motor-Driven Auxiliary Feedwater Pump B. The third violation identified two examples where engineering and maintenance personnel failed to follow established procedures and contact the shift supervisor after identifying a nonconformance.

WCNOG's response to these violations is in the attachment. If you have any questions regarding this response, please contact me at (316) 364-8831, extension 4100, or Mr. Terry S. Morrill at extension 8707.

Very truly yours,



Neil S. Carns

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PDR ADOCK 05000482
G PDR

NSC/jad

Attachment

cc: L. J. Callan (NRC), w/a
W. D. Johnson (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

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Reply to Notice of Violation 50-482/9611-01, -02, -03

Violation 50-482/9611-01: Failure to provide sufficient justification for the effect of water in the bearing oil in an analysis that downgraded the packing in the turbine-driven auxiliary feedwater pump to nonsafety-related.

"A. Criterion V of Appendix B to 10 CFR Part 50 requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Administrative Procedure AP 05-007, "Determination of Safety Classification," Revision 1, Step 6.2.5, requires engineering personnel to identify credible failure modes for the subcomponent and classify as safety-related any part whose failure could prevent the parent component from meeting its safety-related function.

Contrary to the above, on April 5, 1996, engineering personnel completed Safety Classification Analysis 96-0047, concluding that the packing for the turbine-driven auxiliary feedwater pump was nonsafety-related, without adequately dispositioning the potential for a packing failure as having the potential to render the turbine-driven auxiliary feedwater pump inoperable.

This is a Severity Level IV violation (Supplement I) (482/9611-01)."

Admission of Violation:

Wolf Creek Nuclear Operating Corporation (WCNOC) acknowledges and agrees that a violation of Criterion V of Appendix B of 10 CFR Part 50, and Administrative Procedure AP 05-007, "Determination of Safety Classification," occurred when engineering personnel failed to adequately disposition the potential for a packing failure to render the Turbine-Driven Auxiliary Feedwater Pump inoperable.

Reason for Violation:

The root cause of this event is personnel error in that the Safety Classification Analysis (SCA) SCA-96-0047, which downgraded the packing in the Turbine-Driven Auxiliary Feedwater Pump (PAL02), did not provide sufficient justification for the conclusion that water resulting from a packing failure would not affect the bearing or other safety-related equipment, as required in Administrative Procedure AP 05-007, "Determination of Safety Classification."

Corrective Steps Taken and Results Achieved:

SCA-96-0047 was revised on July 3, 1996, to more clearly evaluate the credible failure mode of water intrusion into the bearing oil, the effect of water in the oil, and the effect of water spray and water stream on surrounding safety-related components. The revised SCA changed the safety classification of the PAL02 packing from nonsafety-related to safety-related. The applicability statement of Commercial Grade Dedication Package Number 005-P0010 includes the

use of this packing on each end of the Turbine and Motor- Driven Auxiliary Feedwater Pumps.

Procedure AP 05-007 was revised on July 30, 1996, to require a listing of the effects on any safety-related function for each of the identified credible failure modes. The revision also states that all statements or conclusions made in an SCA must have sufficient explanation/background information provided within the body of the SCA to support the statement or conclusion.

The individuals involved with this SCA have been counseled. All personnel qualified to perform SCAs have been assigned required reading on the above procedure revision. Their supervisors will ensure that these personnel will understand and comply with these requirements.

Date When Full Compliance Will Be Achieved:

Full compliance with the above noted requirements has been achieved.

Violation 50-482/9611-02: Failure to follow Administrative Procedure AP 24E-001, "Identification and Control of Materials, Parts, and Components," which resulted in the installation of nonsafety-related packing in the Motor-Driven Auxiliary Feedwater Pump B.

"B. Criterion XV of Appendix B to 10 CFR 50 requires, in part, that measures be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation.

Administrative Procedure AP 24E-001, "Identification and Control of Materials, Parts, and Components," Revision 0, Step 6.1.8.1, requires that the safety classification of items selected for use in safety-related systems, structures, or components be the same as the safety classification of the system, structure or component unless the results of an engineering evaluation document performed by engineering determines it to be different. Step 6.1.10.2 requires the remarks section of the bill of material to be annotated to justify the selection of nonsafety-related parts for work on safety-related components.

Contrary to the above, on May 2, 1996, Work Package 112153 identified the use of a nonsafety-related material code without justification and nonsafety-related packing was installed in Motor-Driven Auxiliary Feedwater Pump B. No engineering evaluation was performed prior to this installation.

This is a Severity Level IV violation (Supplement I) (482/9611-02)"

Admission of Violation:

Wolf Creek Nuclear Operating Corporation (WCNOC) acknowledges and agrees that a violation of Criterion XV of Appendix B to 10 CFR 50 and Administrative Procedure AP 24E-001 occurred when WCNOC personnel failed to justify the use of the nonsafety-related packing in the safety-related Motor-Driven Auxiliary Feedwater Pump B (PAL01B) prior to installation.

Reason for Violation:

The root cause of this event is failure to follow established procedures and programs.

Administrative Procedure AP 05-002, "Dispositions and Change Packages," which requires that changes to governing documents be initiated as part of the change package process was not followed by engineering personnel. In order to use the packing detailed in Configuration Change Package (CCP) 06512 in the Motor-Driven Auxiliary Feedwater Pump, it needed to be safety related, accepted by a commercial grade dedication, or the application downgraded by a Safety Classification Analysis (SCA). None of the above actions had been implemented when CCP 06512, Revision 2 was issued.

Administrative Procedure AP 24E-001, "Identification and Control of Materials, Parts, and Components," identifies CCPs and SCAs as possible documents to review for an item's safety classification and step 6.1.10 states that if there is a discrepancy between the safety classification of a part and its intended component, the discrepancy must be justified on the Bill of Material in the remarks section. Maintenance Planning personnel failed to adequately document

relevant design information as required and to document their findings on the Bill of Material.

Materials Management personnel failed to adequately review and document relevant design documentation which resulted in inaccurate information being incorporated into the Material Management Database (MATMAN).

Corrective Steps Taken and Results Achieved:

Safety Classification Analysis 96-0057 determined that the packing material for the Motor-Driven Auxiliary Feedwater Pumps is safety-related.

Commercial Grade Dedication (CGD) 005-P0010 dedicated the John Crane Style 1625G graphite packing material for the Motor-Driven Auxiliary Feedwater Pumps.

Engineering personnel who perform change packages have received training emphasizing the need for all related documents to be initiated, in accordance with AP 05-002.

The procurement database was revised to delete component references to the subject packing material code. Materials Engineering and Materials Technical personnel were held discussions to reinforce the necessity of maintaining accurate information in procurement databases.

An On the Spot Change to Procedure AP 24E-001 was issued on July 3, 1996, to provide specific instructions to Maintenance Planning personnel on where to obtain SCA information when non-safety parts are selected for use in safety-related applications.

As part of WCNO's root cause analysis, the Performance Improvement Request (PIR) database was reviewed and no similar occurrences were found.

Date When Full Compliance Will Be Achieved:

Full compliance with the above noted requirements has been achieved and all corrective actions to prevent recurrence have been completed.

Violation 50-482/9611-03: Failure of engineering personnel to contact the shift supervisor after identifying that nonsafety-related packing had been installed in Motor-Driven Auxiliary Feedwater Pump B.

"C. Criterion V of Appendix B to 10 CFR Part 50 requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Administrative Procedure AP 16C-001, "Action Request," Revision 0, Step 5.3.2, requires personnel to immediately notify the shift supervisor of any abnormal conditions that may be an immediate threat to plant personnel, equipment, or the general public, including potential plant operability or reportability concerns.

Contrary to the above, on May 3, 1996, the shift supervisor was not informed after engineering discovered that nonsafety-related packing had been installed in Motor-Driven Auxiliary Feedwater Pump B without the required performance of a safety-classification analysis, causing the operability of the pump to come into question.

This is a Severity Level IV violation (Supplement I) (482/9611-03)."

Admission of Violation:

Wolf Creek Nuclear Operating Corporation (WCNOC) acknowledges and agrees that a violation of Criterion V of Appendix B to 10 CFR 50 and Administrative Procedure AP 16C-001, "Action Request," occurred on May 3, 1996, when Engineering personnel failed to contact the shift supervisor after identifying that nonsafety-related packing material had been installed in Motor-Driven Auxiliary Feedwater Pump B (PAL01B).

A second example of the same type of violation occurred on July 1, 1996, when the Control Room was informed by the Senior Resident Inspector that while watching Maintenance personnel perform an oil change on the D Component Cooling Water pump, a measurement that was not in accordance with the procedure was observed. The Control Room was unaware of this nonconformance until the inspector brought it to their attention approximately forty-five minutes after the event occurred. Approximately fifteen minutes after the Control Room was informed, the Central Work Authority was contacted and also did not have prior knowledge of the event.

Reason for Violation:

The root cause of both examples is ineffective procedural guidance and inadequate awareness of procedures.

The requirements, contained in existing procedures, to notify the Shift Supervisor of potential operability concerns were not effective in these situations and resulted in the lack of a clear and uniform understanding by plant personnel. Applicable procedures (KGP-1201, "Corrective Action;" AP 16C-001, "Action Request;" and AP 28A-001, "Performance Improvement Requests") were not consistent in their description of the proper initial point of

contact. These inconsistencies allowed individuals who were not routinely and directly involved in day-to-day plant operation issues to be unaware of their responsibilities regarding prompt notification to the Shift Supervisor (SS) or Central Work Authority (CWA) of discovered nonconformances. Additionally, there was lack of clear understanding of the requirements to contact the SS when nonconformances are found while equipment is tagged out of service.

Corrective Steps Taken and Results Achieved:

As an interim measure, the Plant Manager conveyed his expectations in a memorandum (WO 96-0126) to all plant personnel that communication of discovered nonconformances and noncompliances to the Control Room is imperative due to the potential impact upon operability of plant equipment. This memorandum addressed that clear communication and feedback are required when addressing routine and emergent activities to ensure that the potential operability impact is considered. Responsibility for SS notification must be assigned and accepted. The memorandum was distributed on August 16, 1996.

Corrective Steps To Be Taken:

- Procedures KGP-1201, "Corrective Action;" AP 16C-001, "Action Request;" and AP 28A-001, "Performance Improvement Requests" will be revised by September 2, 1996, to incorporate the Plant Manager's expectations and to ensure consistent procedural guidance is given for SS and CWA notification requirements.
- In parallel, the efficacy of the corrective action program will be evaluated, and necessary changes will be made by September 16, 1996.
- A self assessment will be conducted and completed by November 11, 1996, to confirm that this information has been effectively communicated to appropriate individuals.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by September 16, 1996, when the changes to the corrective action program are made. The effectiveness of these corrective actions will be confirmed by the self assessment to be completed by November 11, 1996.