

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan  
Vice President Nuclear Assurance

September 16, 1992

NA 92-0057

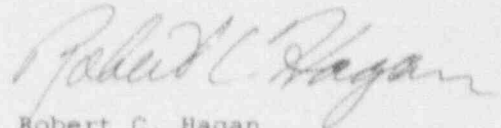
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

Subject: Docket No. 50-482: Licensee Event Report 92-014-00

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,



Robert C. Hagan  
Vice President  
Nuclear Assurance

RCH/jra

Attachment

cc: A. T. Howell (NRC), w/a  
J. L. Milhoan (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 8 2 1</b>				PAGE (3) <b>1 of 0 4</b>	
TITLE (4) <b>Failure To Verify Two Containment Isolation Valves Locked Closed 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 (5)						
0 1	2 3	9 2	9 2	- 0 1 4	- 0 0	0 9	1 6	9 2	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)													
POWER LEVEL (10)		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)							
1 0 0		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)		50.73(a)(2)(i)		50.73(a)(2)(viii)(A)									
		20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)									
		20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(ix)									
LICENSEE CONTACT FOR THIS LER (12)															
NAME										TELEPHONE NUMBER					
Kevin J. Moles - Manager Regulatory Services										AREA CODE 3 1 6 3 6 4 - 8 8 3 1					
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)															
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPPDS						
SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO					

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On August 17, 1992, at approximately 1100 CST, during normal power operation, it was discovered that valves EFHV049 and EFHV050 were not verified locked closed by January 23, 1992 as required by Technical Specification (T/S) Surveillance Requirement 4.6.1.1.a. Surveillance procedure STS GP-007, "Containment Penetration Isolation Verification," which is accomplished to satisfy T/S Surveillance Requirement 4.6.1.1.a, was accomplished on January 16, 1992; however, valves EFHV049 and EFHV050 were not verified. These valves were verified locked closed during the subsequent surveillance on February 15, 1992.

The root cause of this event was a cognitive error by a licensed operator who failed to verify that valves EFHV049 and EFHV050 were locked closed. Valves EFHV049 and EFHV050, which are located outside containment and are required to be verified closed every 31 days, were marked "not applicable" along with the rest of the valves in a listing which are located inside containment and are required to be verified closed only during each Cold Shutdown. Also, a second cognitive error occurred when a second licensed operator did not properly review the valves which were marked "not applicable." This event has been discussed with the individuals involved.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Wolf Creek Generating Station	0500048292	0	14	0	0	2 OF 04

TEXT (If more space is required, use additional NRC Form 368A's) (17)

**INTRODUCTION**

On August 17, 1992, at approximately 1100 CST, during normal power operation, it was discovered that Essential Service Water (ESW) "A" from Containment Air Coolers valve EFHV049 [BI-ISV] and ESW "B" from Containment Air Coolers valve EFHV050 [BI-ISV] were not verified locked closed by January 23, 1992 as required by Technical Specification Surveillance Requirement 4.6.1.1.a. Surveillance procedure STS GP-007, "Containment Penetration Isolation Verification," which is accomplished to satisfy Technical Specification Surveillance Requirement 4.6.1.1.a, was accomplished on January 16, 1992; however, valves EFHV049 and EFHV050 were not verified. 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. This is accomplished 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 plant modification was made during the fifth refueling outage which required the closure of valves EFHV049 and EFHV050 during normal plant operation and post-Loss of Coolant Accident operation. Following the modification, these valves, which are located outside containment, were incorporated into surveillance procedure STS GP-007, "Containment Penetration Isolation Verification," in order to be verified locked closed in accordance with Technical Specification Surveillance Requirement 4.6.1.1.a. The revised surveillance procedure STS GP-007 was successfully accomplished on December 15, 1991, including verification of valves EFHV049 and EFHV050. The next scheduled performance of STS GP-007 was January 16, 1992 with a late date of January 23, 1992. Surveillance procedure STS GP-007 was accomplished on January 16, 1992; however, valves EFHV049 and EFHV050 were not verified during the performance.

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Wolf Creek Generating Station	0500048292	-	014	-	000	3 OF 4

TEXT (If more space is required, use additional NRC Form 306A's) (12)

On August 17, 1992, at approximately 1100 CDT, following a review of previous performances of surveillance procedure STS GP-007, it was discovered that valves EFHV049 and EFHV050 had not been verified locked closed on January 16, 1992. This review was conducted following the performance of STS GP-007 on August 16, 1992, in which it was discovered that valves EFHV049 and EFHV050 had not been verified locked closed during a post test review. The valves were immediately verified to be locked closed and the review of previous performances of STS GP-007 was initiated in which it was discovered that valves EFHV049 and EFHV050 had not been verified locked closed on January 16, 1992.

**ROOT CAUSE AND CORRECTIVE ACTIONS**

The root cause of this event was a cognitive error by a licensed operator who failed to verify that valves EFHV049 and EFHV050 were locked closed during the performance of STS GP-007 on January 16, 1992. When valves EFHV049 and EFHV050 were incorporated into surveillance procedure STS GP-007 on November 15, 1991, they were placed in a listing in the middle of a page of valves that are located inside containment and are required to be verified closed only during each Cold Shutdown. During the performance of STS GP-007 on January 16, 1992, valves EFHV049 and EFHV050, which are located outside containment, were marked "not applicable" along with the rest of the valves in the listing which are located inside containment. Also, a second cognitive error occurred when a second licensed operator did not properly review the valves which were marked "not applicable." This review by the second licensed operator is required since double verification that the valves are locked closed is required by surveillance procedure STS GP-007. Surveillance procedure STS GP-007 has been successfully performed every 31 days, including valves EFHV049 and EFHV050, since January 16, 1992. This Licensee Event Report will be included in Operations Required Reading to ensure that all licensed personnel are cognizant of the details of this event. Also, this event has been discussed with the individuals involved to emphasize the importance of paying attention to details during the performance of procedures.

A contributing factor to this event was that human factors were not taken into account during the revision process of surveillance procedure STS GP-007. Valves EFHV049 and EFHV050 were not placed in a listing with valves that are located outside containment and are required to be verified closed every 31 days. Surveillance procedure STS GP-007 has been revised to place the valves in the appropriate section of the listing.



**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

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Wolf Creek Generating Station	01500048292	-	014	-	0004	OF 04

TEXT (If more space is required, use additional NRC Form 306A's) (17)

**ADDITIONAL INFORMATION**

During the time that valves FPHV049 and EPHV050 were not verified locked closed, January 23 through February 15, the plant was in Mode 1, Power Operation, at approximately 100 percent Reactor power. Although valves EPHV049 and EPHV050 were not verified locked closed within the required time frame, the satisfactory completion of STS GP-007 on February 15, 1992, indicates that the valves were locked closed. Therefore, at no time did conditions develop that may have posed a threat to the health and safety of the public. There was no damage to plant equipment or release of radioactivity as a result of this event.

Licensee Event Report 92-005-00 describes a previous occurrence in which two containment penetration drain valves were not verified locked closed. The corrective actions taken in response to that event did not address the circumstances of this event.