

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, 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)

05000482

PAGE (3)

1 OF 5

TITLE (4)

Failure To Comply With Technical Specification Surveillance Requirement 4.5.3.2

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
10	16	96	96	011	01	01	31	97		DOCKET NUMBER
OPERATING			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
MODE 1			20 402(b)			20 405(c)			50 73(a)(2)(iv)	73 71(b)
POWER			20 405(a)(1)(i)			50 36(c)(1)			50 73(a)(2)(v)	73 71(c)
100%			20 405(a)(1)(ii)			50 36(c)(2)			50 73(a)(2)(vii)	OTHER
			20 405(a)(1)(iii)		X	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)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

R. D. Flannigan
Manager Nuclear Engineering, Safety and
Licensing

TELEPHONE NUMBER (Include Area Code)

316-364-8831-4500

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
		N/A							

SUPPLEMENTAL REPORT EXPECTED (14)

EXPECTED

MONTH

DAY

YEAR

YES

(If yes, completed EXPECTED SUBMISSION DATE)

X

NO

ABSTRACT:

On October 16, 1996, it was determined that Technical Specification Clarification (TSC) 009-85 was inappropriate to the circumstances, in that, as written, the clarification would allow the control room operators to violate Technical Specification 3.5.3, "ECCS Subsystems - $T_{ave} < 350^{\circ} F$," Surveillance Requirement 4.5.3.2, and Technical Specification 3.5.4, "ECCS Subsystems - $T_{ave} < 200^{\circ} F$." Subsequent review determined that WCNOC violated Technical Specification Surveillance Requirement 4.1.2.3.2 on October 24, 1994. All Centrifugal Charging Pump (CCP) swaps since September of 1985 were reviewed with no other violations of this technical specification being discovered. Root cause was determined to be a misalignment between the Wolf Creek organization culture and the regulatory environment. Corrective actions include deletion of TSC 009-85, extensive revision of the TSC procedure and process, inclusion of the deletion notice for TSC 009-85 in the Operations Essential Reading Program, and periodic training on verbatim compliance. The failure to comply with Technical Specification Surveillance is reportable per 10 CFR 50.73(a)(2)(i).

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Plant Conditions Prior to the Event:

MODE = 1
Reactor Coolant Pressure = 2234 psig
Reactor Power = 100%

Basis for Reportability:

10 CFR 50.73(a)(2)(i)(B) requires each licensee to report any operation or condition prohibited by the plant's technical specifications.

Technical Specification Surveillance 4.1.2.3.2 required:

That with the exception of the required operable charging pump [CB-P], charging pumps should be demonstrated inoperable by verification of open motor circuit breakers [CB-BKR]. This requirement is satisfied by verifying that the motor circuit breakers are secured in the open position at least once per 31 days. This restriction is intended to prevent cold overpressurization event by limiting the sources for the inadvertent addition of water to the RCS [AB]. An inoperable pump may be energized for testing or for filling accumulators, provided the discharge of the pump has been isolated from the RCS by a closed isolations valve with power removed from the valve operator, or by a manual isolation valve secured in the closed position.

Technical Specification Clarification (TSC) 009-85 stated:

"These specs. allow only 1 CCP to be lined up to the RCS with its BKR closed in Modes 4, 5, and 6. This precludes shifting from 1 CCP to the other while maintaining continuous flow to the RCP seals [AB-P-SEAL]. Also Spec. 3.1.2.1 requires 1 flow path through a CCP for boration. Isolating both CCPs by racking the BKR down and/or closing BG-V8485A/B for this shift will violate T.S. 3.1.2.1/3.1.2.3/3.5.3. Also, in Modes 1, 2, and 3, opening BG-8483 A&C violates additional guidelines for safety injection through the BIT [CB-TK]. Maintaining filtered seal injection to the RCP's and a boration flow path simultaneously is the prime concern. In all Modes, Operation of the CCP's in parallel for this brief evolution does not place the plant in a degraded condition and is in fact the most conservative way to comply with present WCGS Technical Specifications."

Implementation of TSC 009-85 (i.e., racking in the second centrifugal charging pump prior to racking out the first pump) resulted in a direct violation of Technical Specification Surveillance Requirement 4.1.2.3.2, on October 24, 1994. Noncompliance with Technical Specification Surveillance 4.1.2.3.2 is reportable per 10 CFR 50.73(a)(2)(i)(B).

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Description of Event:

On October 16, 1996, it was determined that TSC 009-85 was inappropriate to the circumstances, in that as written, the clarification would allow the control room operators to violate Wolf Creek Nuclear Operating Corporation (WCNOC) Technical Specification 3.5.3, "ECCS Subsystems - $T_{ave} < 200^{\circ}\text{F}$," Surveillance Requirement 4.5.3.2. Subsequent review determined that WCNOC violated Technical Specification Surveillance Requirement 4.1.2.3.2 on October 24, 1994. No other violations of this Technical Specification are known.

Root Cause and Corrective Actions:

Root Cause

Root cause was determined to be a misalignment between the Wolf Creek organization culture and the regulatory environment. This misalignment was evidenced in the following three areas:

- Technical Specification Application

Wolf Creek's "mind set" was to assess plant conditions and use operational knowledge in the application of the Technical Specifications. In some cases verbatim Technical Specification compliance was compromised. The regulatory environment requires verbatim compliance while preserving an understanding of how the bases for the Technical Specifications are to be applied.

- Misapplication of the Technical Specification Clarification (TSC) Process

This "mind set" was a key contributor to misapplication of the TSC process. This misapplication resulted in instances where the clarification constituted a change to the Technical Specifications, or their bases, without proper regulatory evaluation or approval.

- Standards

This "mind set" also influenced the standards applied to TSC review and approval, and internal assessments of the health of the TSC process.

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Corrective Actions

Immediate:

- The on-duty Shift Supervisor was notified of the concern.
- TSC 009-85 was deleted, and removed from the Control Room.
- The deletion notice for TSC 009-85 was placed in the Operations Essential Reading Program. This action was taken to assure all licensed personnel were made aware of the concern related to this clarification prior to assuming their next watch.
- Operations' staff initiated Performance Improvement Request 96-2605 to document the concern, investigation results, and the implementation of corrective actions.
- Operations' staff performed an internal detailed review of all developed TSCs to determine extent of the concern. This review identified a total of fourteen clarifications which could have potentially caused a violation of the associated Technical Specification. PIRs were written for each occurrence. A total of six Technical Specification violations were identified. LERs were issued for each violation.
- WCNOG established Incident Investigation Team (IIT) 96-004, on October 23, 1996, to evaluate the TSC Process. This IIT determined the root cause for this event and recommended corrective actions to prevent recurrence.

Corrective Actions to Prevent Recurrence:

- The Chief Operating Officer will complete follow-up sessions with all departments, communicating management expectations regarding the need for verbatim compliance with Nuclear Regulatory requirements. This activity will be completed by February 28, 1997.
- Periodic training will be provided to ensure the proper alignment between the Wolf Creek culture and the regulatory environment on verbatim compliance.
- WCGS Administrative Procedure AP 26C-003, Revision 0, "Technical Specification Clarifications" will be enhanced by March 15, 1997, to incorporate additional programmatic improvements.

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Safety Significance:

Although the simultaneous operation of both Centrifugal Charging Pumps (CCPs) in MODE 5 was a violation of the Technical Specification, this action did not represent a reduction in safety. This action was taken to minimize the cyclic effects, on the reactor coolant pump seals, caused by stopping and starting CCPs. Surveillance 4.2.1.3.2 was revised per Amendment 89 on October 2, 1995 and is now contained in Technical Specification 3.5.4. The revised Technical Specification allows four hours to restore one CCP to inoperable status. The event which occurred on October 24, 1994 resulted in both CCPs being operable for eight minutes. Based on the Safety Evaluation which gave allowance for these pumps to both be operable for up to four hours this event is of low safety significance. Also, there is no safety significance to this event because a single power operated relief valve has sufficient capacity to relieve the mass addition of two CCPs without exceeding 10 CFR 50 Appendix "G" limits. During these periods WCNOG had dedicated licensed personnel in the control room who oversaw the operation of these pumps and stood ready to implement actions, as appropriate, to prevent any adverse affects on the reactor coolant system.

Other Previous Occurrences:

None.