

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 4.5.1.1.a.1

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
10	18	96	96	012	01	01	31	97	FACILITY NAME	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

Richard 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 18, 1996, during the cause and extent evaluation performed as a result of Wolf Creek Nuclear Operating Corporation (WCNOC) Licensee Event Report (LER) 96-011-00, it was determined that Technical Specification Clarification (TSC) 004-86 was inappropriate to the circumstances. This Technical Specification Clarification, as written, would allow the Control Room operators to violate Technical Specification 3.5.1, "Accumulators," Surveillance 4.5.1.1.a.1. Subsequent review determined that WCNOC violated Technical Specification Surveillance 4.5.1.1.a.1 between the dates of: 1) September 5, 1988 through November 4, 1988, 2) October 21, 1992 through November 25, 1992, and 3) September 25, 1996, and October 2, 1996. No other violations of this Technical Specification are known. The root cause of this event was determined to be a misalignment between the Wolf Creek organization culture and the regulatory environment. Corrective actions include deletion of TSC 004-86, extensive revision of the TSC procedure and process, inclusion of the deletion notice for TSC 004-86 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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Wolf Creek Generating Station	05000482	96	012	00	2 OF 5

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 4.5.1.1.a.1 stated:

"Each accumulator [BQ-ACC] shall be demonstrated OPERABLE, at least once per 12 hours by verifying, by the absence of alarms, the contained borated water volume and nitrogen cover-pressure in the tanks."

Technical Specification Clarification (TSC) 004-86 stated:

"A question has been asked concerning Accumulator [EP] level and pressure alarms [BQ-LA-BQ-PA]. Since the surveillance requirement states that each accumulator shall be demonstrated OPERABLE at least once per 12 hours by verifying, by the absence of alarms, the contained borated water volume and nitrogen cover-pressure in the tanks, does the presence of an alarm invalidate the logged levels and pressures, even though they are within the Tech. Spec. limit? The following is the suggested interpretation;

Being the alarms are not set at the Tech. Spec. limits for level and pressure, they serve as a warning to the operator. Since STS CR-001 requires the operator to log accumulator tanks' level and pressure, once per shift, these logged readings are to be used as the criteria for meeting this Tech. Spec."

Tech Spec Limits Versus Actual Procedural Entry Limits

Tech Spec High	Procedure High	Tech Spec Low	Procedure Low
6594 gallons	6458 gallons	6122 gallons	6283 gallons
665 psig	648.13 psig	585 psig	601.13 psig

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Implementation of TSC 004-86 (i.e., verifying the actual level and pressure in place of verifying the absence of alarms) resulted in a direct violation of Technical Specification Surveillance 4.5.1.1.a.1, between the dates of: 1) September 5, 1988 through November 4, 1988, 2) October 21, 1992 through November 25, 1992, and 3) September 25, 1996, and October 2, 1996. No other violations of this Technical Specification are known. Noncompliance with Technical Specification Surveillance 4.5.1.1.a.1 is reportable per 10 CFR 50.73(a)(2)(i)(B).

Description of Event:

On October 18, 1996, during the cause and extent evaluation being performed as a result of Wolf Creek Nuclear Operating Corporation (WCNOC) Licensee Event Report (LER) 96-011-00, it was determined that Technical Specification Clarification (TSC) 004-86 was inappropriate to the circumstances. This Technical Specification Clarification, as written, would allow the Control Room operators to violate Technical Specification 3.5.1, "Accumulators," Surveillance 4.5.1.1.a.1. Subsequent review determined that WCNOC violated Technical Specification Surveillance 4.5.1.1.a.1 between the dates of: 1) September 5, 1988 through November 4, 1988, 2) October 21, 1992 through November 25, 1992, and 3) September 25, 1996, and October 2, 1996.

Root Cause and Corrective Actions:

Root Cause and Contributing Factors:

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.

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• Standards

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

Corrective Actions

Immediate:

- The on-duty Shift Supervisor was notified of the concern.
- TSC 004-86 was deleted and removed from the Control Room.
- The deletion notice for TSC 004-86 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 96-2647 to document the concern, investigation results, and the implementation of corrective actions.
- Operations' staff, as part of its investigation activities related to WCNOG LER 96-011-00, performed a 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. This concern (LER 96-012) was identified as part of this review.
- As a result of the investigation activities associated with WCNOG LER 96-011-00, WCNOG established Incident Investigation Team (IIT) 96-004. This IIT was established on October 23, 1996, to evaluate the TSC Process.

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.

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- WCGS Administrative Procedure AP 26C-003, Revision 0, "Technical Specification Clarifications" will be enhanced by March 15, 1997, to incorporate additional programmatic improvements.
- On March 25, 1995, WCNOC submitted a license amendment request to Technical Specification 3.5.1. This request included revising Surveillance Requirement 4.5.1.1.a.1 to remove reference to verifying operability "by the absence of alarms" which was consistent with the quittance of Generic Letter 93-05. WCNOC subsequently requested that this portion of the license amendment request be reviewed, and Amendment # 103 was issued on November 22, 1996.

Safety Significance:

Although the substitution of verifying actual accumulator levels and pressures in place of verifying the absence of accumulator related alarms was a violation of the Technical Specification, this action did not represent a reduction in safety. This action provided the operators with an enhanced knowledge of the actual condition of the accumulators by providing them with a greater understanding of critical system parameters (i.e., accumulator level and nitrogen over pressure). Additionally, by checking actual system parameters, the operators are able to observe/trend changes in these parameters, and to take actions prior to the parameters reaching or violating a Technical Specification. The required parameters for accumulators are verified using STS CR-001 once each eight hours. A failure to meet these parameters would have resulted in the appropriate limiting condition for operation entry. However, at no time were the Technical Specification numerical values for level and pressure exceeded.

Other Previous Occurrences:

LER 96-011-00: WCNOC LER 96-011-00 documented a similar event. The event documented in LER 96-012-00, and in this Supplemental LER 96-012-01, was discovered two days after the event documented in LER 96-011-00. Therefore, root cause and corrective actions to prevent recurrence associated with LER 96-011-00 were still under evaluation, and could not have prevented the occurrence of this event.

WCNOC LERs 96-013-00, 96-014-00, 96-015-00, and 96-016-00, and their respective supplements, document similar events of inappropriate use of TSCs. However, these events were identified after the identification of LER 96-012-00, and could not have prevented the occurrence of this event.