

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:
50.0 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 4.8.1.1.2g.7

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	22	96	96	013	01	01	31	97	FACILITY NAME	DOCKET NUMBER
OPERATING MODE 1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER 100%			20.402(b)			20.405(c)			50.73(a)(2)(iv)	73.71(b)
			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)(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	

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 22, 1996, during the cause and extent evaluation performed as part of the corrective action process for Licensee Event Report (LER) 96-011-00, it was determined that Technical Specification Clarification (TSC) 005-94 was inappropriate to the circumstances. The Technical Specification Clarification allowed control room operators to violate Technical Specification Surveillance Requirement 4.8.1.1.2g.7, by not performing a Hot Restart Test within five minutes after completing the twenty-four hour test. Subsequent review determined that WCNOB violated Technical Specification Surveillance Requirement 4.8.1.1.2g.7 on September 17, 1994; September 16, 1994; February 6, 1996; and March 16, 1996. No other violations of this Technical Specification are known. Root cause was determined to be a misalignment between the Wolf Creek organization culture and the regulatory environment. Corrective actions include deletion of TSC 005-94, extensive revision of the TSC procedure and process, inclusion of the deletion notice for TSC 005-94 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	013	01	2 OF 5

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

Plant Conditions Prior to the Event:

Operational Status = 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.

At the time these four violations occurred, Technical Specification Surveillance 4.8.1.1.2g.7 stated that:

"Each diesel generator [EK-DG] shall be demonstrated OPERABLE : ... At least once per 18 months, during shutdown, by: ... Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to an indicated 6600 to 6821 kW** and during the remaining 22 hours of this test, the diesel generator shall be loaded to an indicated 6000 to 6201 kW**. The generator voltage and frequency shall be 4160 +120-420 volts and 60 +1.2 Hz, -3 HZ within 12 seconds after the start signal: the steady-state generator voltage and frequency shall be maintained within 4160 + 160 - 420 volts and 60 ± 1.2 Hz during this test. Within 5 minutes after completing this 24-hour test, perform Surveillance 4.8.1.1.2g.6b.*

*If Specification 4.8.1.1.2g.6b is not satisfactorily completed, it is not necessary to repeat the preceding 24 hour test. Instead, the diesel generator may be operated at 6201 kW for 1 hour or until operating temperature has stabilized.

**This test shall be preceded by an engine prelube period and/or other warmup procedures recommended by the manufacturer so that the mechanical stress and wear on the diesel engine is minimized."

WCNOC Technical Specification Clarification (TSC) 005-94, issued on July 5, 1994, incorrectly allowed the intentional separation of the 4.8.1.1.2g.6b Hot Restart Test from the 4.8.1.1.2g.7 Twenty-four Hour Test. This clarification was based on the note in the Technical Specification which stated that, if Specification 4.8.1.1.2g.6b was not satisfactorily completed, it was not necessary to repeat the preceding twenty-four hour test. Instead, the note stated that the diesel generator could be operated at 6201 kW for 1 hour or until operating temperature has stabilized.

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

Description of Event:

On October 22, 1996, during the cause and extent evaluation being performed as part of the corrective action process for Licensee Event Report (LER) 96-011-00, it was determined that Technical Specification Clarification (TSC) 005-94 was inappropriate to the circumstances. This Technical Specification Clarification, as written, could allow for the violation of Technical Specification Surveillance Requirement 4.8.1.1.2g.7.

Subsequent review determined that WCNOG violated Technical Specification Surveillance Requirement 4.8.1.1.2g.7 on September 17, 1994; September 16, 1994; February 6, 1996; and March 16, 1996. 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 Corrective Actions:

- The on-duty Shift Supervisor was notified of the concern.
- TSC 005-94 was deleted on October 22, 1996, and removed from the Control Room.
- The deletion notice for TSC 005-94 was placed in the Operations Essential Reading Program. This action was taken to assure all licensed personnel were made aware of the concerns related to this clarification prior to assuming their next watch.
- Operations' staff initiated Performance Improvement Request 96-2684 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:

Technical Specification Surveillance Requirement 4.8.1.1.2g.7 required a Hot Restart Test to be performed within five minutes of completing the required twenty-four hour run of the Emergency Diesel Generator every 18 months. Although this requirement existed, Regulatory Guide 1.9, Revision 3, "Selection, Design, Qualification, and Testing of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants" was issued to allow for removing this requirement. Following the issuance of Regulatory Guide 1.9, Amendment 101 to the WCGS Technical Specifications was initiated to remove the requirement that Hot Restart Test be performed within five minutes of the twenty-four run. The Safety Evaluation for the Amendment 101 changes was based on Regulatory Guide 1.9.

No safety concerns are identified for not performing the Hot Restart Testing within five minutes of completion of the twenty-four hour run, based on the approval of Amendment 101 by the NRC. During each applicable outage, the Hot Restart was performed following a two hour run at full load, as required by Amendment 101. Therefore, no degradation of equipment was experienced, the EDG performance was maintained at an acceptable level, and there was no danger to the health and safety of the public.

Other Previous Occurrences:

WCNOC LERs 96-011-00, 96-012, 96-014, 96-015, and 96-016 document similar events. The event documented in this supplemental LER (96-013-01) was discovered six 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 and subsequent LERs of a similar nature were still under evaluation, and could not have prevented the occurrences of this event.