

## 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 6

TITLE (4)

Failure To Comply With Technical Specification 4.5.2.c for Visual Inspection of Containment

| 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             | 18  | 96   | 96  | 014               | 01               | 01              | 31                   | 97   | FACILITY NAME                 | DOCKET NUMBER |
| OPERATING      |     |      | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (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 18, 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) 010-85 may have been inappropriate to the circumstances. This Technical Specification Clarification allowed plant personnel to violate Technical Specification Surveillance 4.5.2.c for the visual inspection of containment for loose debris. Root cause was determined to be a misalignment between the Wolf Creek organization culture and the regulatory environment. Corrective actions include deletion of TSC 010-85, extensive revision of the TSC procedure and process, inclusion of the deletion notice for TSC 010-85 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 Requirement 4.5.3.1 states that the Emergency Core Cooling [BP] subsystems shall be demonstrated OPERABLE per the applicable requirements of Specification 4.5.2.

Technical Specification 4.5.2.c states that visual inspection verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment [NH] which could be transported to the containment sump and cause restriction of the pump suctions during LOCA conditions. This visual inspection shall be performed:

- 1) For all accessible areas of the containment prior to establishing containment integrity, and
- 2) Of the areas affected within containment at the completion of each containment entry when CONTAINMENT INTEGRITY is established.

Technical Specification Clarification (TSC) 010-85 stated:

"Specification 4.5.2.c.2 requires a visual inspection in containment 'of the areas affected within containment at the completion of each containment entry when Containment Integrity is established.' If the containment is being accessed continuously, what should the frequency of inspection be? The following is the suggested interpretation:

STS EJ-001 should be performed on a daily basis while multiple entries are being performed."

WCNOC has implemented TSC 010-85 (i.e., performance of a visual inspection of containment daily versus after every containment entry) many times during the initial entry into and out of refueling outages when containment integrity is established. This has resulted in violation of Technical Specification Surveillance Requirement 4.5.2.c. at various times since 1985. Noncompliance with Technical Specifications is reportable per 10 CFR 50.73(a)(2)(i)(B).

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

Description of Event:

On October 18, 1996, during the cause and extent evaluation performed as part of WCNOC's corrective action process for Licensee Event Report (LER) 96-011-00, it was determined that TSC 010-85 was inappropriate and caused a violation of the surveillance requirement in the past.

The TSC allowed personnel to violate the surveillance requirement for Technical Specifications 3.5.3 and 3.5.2, "Emergency Core Cooling Systems." When containment integrity is required during MODES 1, 2, 3, and 4, the TSC allowed for performance of surveillance procedure, STS EJ-001, "Containment Inspection," once on a daily basis. Entry into Containment during MODES 1, 2, 3, and 4 to perform work is infrequent and the surveillance was performed once daily when entries were made to ensure trash or debris was not left in Containment that could effect the containment sumps.

During entry and exit from refueling outages a Containment Coordinator provides oversight for work occurring in containment. His responsibilities include oversight of housekeeping activities to ensure trash and excess items that may cause a hazardous condition are removed. The Containment Coordinator's review of containment's cleanliness is not officially logged, but occurs on an ongoing basis once the position is established in MODE 4.

The TSC was written because inspections after every entry seemed excessive and it was determined reasonable to perform the surveillance on a daily basis rather than on an entry basis. However, the surveillance requirement stipulates that a visual inspection must be performed after every entry. This clarification has been used multiple times going into and coming out of refueling outages and during maintenance activities performed at power since it was initiated in 1985.

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

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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.

Corrective Actions

Immediate:

- The on-duty Shift Supervisor was notified of the concern.
- TSC 010-85 was deleted, and removed from the Control Room.
- The deletion notice for TSC 010-85 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 96-2732 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.

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## 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.
- A License Amendment Request has been generated to allow for daily inspections.
- Operations personnel reviewed five percent of the completed STS EJ-001, "Containment Inspection," procedures, and verified that the surveillances were being performed on a daily basis and were indeed looking for debris that may clog the containment sumps. The review determined that corrective actions were taken when unnecessary items in containment were discovered, and, in the majority of cases, when items were identified, the surveillance procedure was re-performed again that day, or the next day.

Safety Significance:

The two containment recirculation sumps are collection reservoirs from which the containment spray pumps and the residual heat removal pumps separately take suction after the contents of the refueling water storage tank have been expended. Therefore, when maintenance is ongoing in the containment building it is important to ensure that no large pieces of debris clog the sumps. The surveillance requirement verifies that no loose debris (rags, trash, clothing etc.) is present in containment which could be transported to the containment sumps and cause restriction of the pump suctions during LOCA conditions. The safety significance of only performing the visual inspection once daily is very low because of an ongoing awareness of the hazards of loose debris by WCNOG personnel.

Although STS EJ-001 was only performed once daily when multiple entries were made, this was not indicative of a lack of emphasis on containment cleanliness. A daily surveillance schedule was determined to be acceptable because housekeeping activities within containment are everyone's responsibility and are a continual process. Cleanliness levels are verified once daily. WCNOG's work control processes reinforce the importance of

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maintaining a high level of cleanliness and accountability while in containment. Additionally, WCNOG personnel are trained in Plant Access Training to reduce the amount of waste in radiologically controlled areas, to be aware of unnecessary trash or debris in these areas, and to properly dispose of any excess material.

Containment Coordinators provide oversight of activities within Containment during entry into and exit from refueling outages and provide an ongoing housekeeping evaluation to ensure that trash and debris are appropriately removed. Additionally, during any MODE of operation, Health Physics technicians accompany many of the maintenance crews and provide additional oversight to the cleanliness of the area.

Generic Letter 93-05, "Line Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation" recommended inspections of containment, at least once daily after containment integrity is established, if the containment has been entered that day. A visual inspection, STS EJ-001, "Containment Inspection," is performed once daily, when containment entries have occurred after containment integrity is established. No significant occurrences of loose debris have been found during the performance of this surveillance and any discrepancies were immediately corrected.

Other Previous Occurrences:

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

LER 88-030-00: WCNOG reported a violation of Technical Specification 3.5.2 due to not completing the surveillance requirement to visually inspect containment. The LER reported missing the daily surveillance and did not recognize that the clarification which was in place at the time allowed actions outside of the Technical Specification.