

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Clay C. Warren
Chief Operating Officer

November 15, 1996

WO 96-0148

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

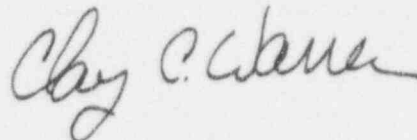
Subject: Docket No. 50-482: Licensee Event Report 96-012-00

Gentlemen:

The attached Licensee Event Report is being submitted pursuant to 10 CFR 50.73(a)(2)(i) concerning a failure to comply with the Technical Specifications.

If you should have any questions regarding this submittal, please contact me at (316) 364-8831 extension 4485, or Mr. Terry S. Morrill at extension 8707.

Very truly yours,



Clay C. Warren

CCW/jad

Attachment

cc: L. J. Callan (NRC), w/a
W. D. Johnson (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

9611220155 961115
PDR ADOCK 05000482
S PDR

IE221

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 4.5.1.1.a.1

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	012	00	11	15	96	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)			50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

Terry S. Morrill
Manager Regulatory Services

TELEPHONE NUMBER (Include Area Code)

316-364-8831-8707

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

X YES
(If yes, completed EXPECTED SUBMISSION DATE)

NO

Yes

1

31

97

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 violation Technical Specification 3.5.1, Accumulators," Surveillance Requirement 4.5.1.1.a.1. Subsequent review determined that WCNOC violated Technical Specification Surveillance Requirement 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 error is under investigation and this LER will be supplemented by January 31, 1997. This supplement will contain a detailed discussion of the root cause and corrective actions to prevent recurrence. Immediate corrective actions included deletion of TSC 009-85, establishment of required reading, and initiation of a investigation to determine cause and extent.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
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		96	012	00	

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 4.5.1.1.a.1 states:

"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."

Technical Specification Clarification (TSC) 004-86 stated:

"A question has been asked concerning Accumulator [BP] level and pressure alarms. 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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Wolf Creek Generating Station	05000482	96	012	00	3 OF 5

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

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 Requirement 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 Requirement 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 violation Technical Specification 3.5.1, "Accumulators," Surveillance Requirement 4.5.1.1.a.1. Subsequent review determined that WCNOC violated Technical Specification Surveillance Requirement 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:

The root causes of this errors is currently under investigation. WCNOC will issue a supplement to this LER by January 31, 1997. This supplemental will contain a detailed discussion of the root cause of both events.

Corrective Actions

Immediate:

TSC 004-86 was deleted and removed from the Control Room.

The Onduty Shift Supervisor was notified of the concern and the immediate actions taken.

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.

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

The operation's staff initiated Performance Improvement Request 96-2647 to document the concern, investigations results, and corrective actions implemented.

The operation's staff initiated a reportability evaluation request (RER 96-030) to assure all reportability aspects of this violation were evaluated.

The operation's staff, as part of its investigation activities related to WCNO LER 96-011-00, performed a detailed review of all developed TSCs to determine extent of the concern. This review identified a total of 12 clarifications which could have potentially caused a violation of the associated technical specification. This concern was identified as part of this review. These TSCs are undergoing additional review and WCNO will issue additional reviews to document each TSC which resulted in an actual violation of the associated clarification.

As a result of the investigation activities associated with WCNO LER 96-011-00, WCNO established Incident Investigation Team (IIT) 96-004. This IIT was established on October 23, 1996, to evaluate the TSC Process. WCNO will supplement this LER, no later than January 31, 1997, upon issuance of the IIT report.

Long Term:

Corrective actions to prevent recurrence are under evaluation and will be established no later than January 31, 1997. At that time a supplement to this LER will issued and will provide, in part, the corrective actions to prevent recurrence.

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 in 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 requirement. The required parameters for accumulators are recorded per STS CR-001 once per 8 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.

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Other Previous Occurrences:

LER 96-011-00: WCNOG LER 96-011-00 document a similar event. The event documented in this LER (96-012-00) 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 are still under evaluation and could not have prevent the occurrence of this event.