

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Clay C. Warren  
Chief Operating Officer

November 22, 1996

WO 96-0153

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

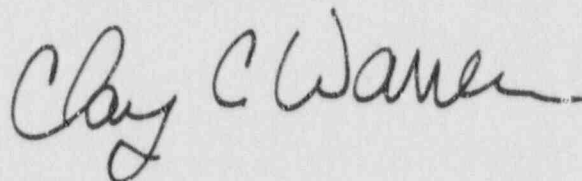
Subject: Docket No. 50-482: Licensee Event Report 96-015-00

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

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## 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
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## TITLE (4)

Failure To Comply With Technical Specification 3.6.1.1, "Containment Integrity"

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	23	96	96	015	00	11	22	96	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)		50.38(c)(1)		50.73(a)(2)(v)		73.71(c)	
100%			20.405(a)(1)(ii)		50.38(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, ext. 8707
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## 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)

X	YES	NO	EXPECTED	MONTH	DAY	YEAR
	(If yes, completed EXPECTED SUBMISSION DATE)			1	31	97

## ABSTRACT

On October 23, 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) 033-85 may have constituted a change to Technical Specification 3.6.1.1, "Containment Integrity," because it allowed opening of penetration vent or drain valves to facilitate testing. Subsequent review determined that the last three instances that Wolf Creek Nuclear Operating Corporation (WCNOC) utilized TSC 033-85 was between June 1, 1996 and October 3, 1996. 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 the deletion of TSC 033-85 and the establishment of essential required reading, and initiation of a investigation to determine cause and extent. The failure to comply with technical specification requirement is reportable per 10CFR50.73(a)(2)(i).

**LICENSEE EVENT REPORT (LER)**  
TEXT CONTINUATION

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Wolf Creek Generating Station	05000482	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 5
		96	015	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  
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 3.6.1.1 is applicable to MODES 1, 2, 3, and 4, and states:

"Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

Technical Specification Classification (TSC) 033-85 stated:

"For the purpose of Local Leak Rate Testing, opening of the vent and drain valves simultaneously shall not be construed as a breach of containment integrity, so long as an individual is in constant communication with the Control Room, is stationed at the appropriate valve or valves, this individual's sole responsibility shall be to re-establish isolation in the event so instructed or upon loss of communication. This individual shall be designated by the Shift Supervisor and the individual's name shall be entered as a test performer on the surveillance cover sheet."

The TSC allows for the use of a dedicated operator when maintaining containment integrity. The technical specification requires that all penetrations not capable of being closed by operable containment automatic isolation valve and required to be closed during accident conditions are closed by valves, blind flanges or deactivated automatic valves secured in their positions.

**LICENSEE EVENT REPORT (LER)**  
TEXT CONTINUATION

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.

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

**Description of Event:**

On October 23, 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) 033-85 was inappropriate to the circumstances. This technical specification clarification allowed a violation of Technical Specification 3.6.1.1, "Containment Integrity." Subsequent review determined that Technical Specification 3.6.1.1 has been violated a number of times in the past, with the most recent instances occurring June 1, 1996, September 30, 1996, and October 3, 1996.

**Root Cause and Corrective Actions:****Root Cause and Contributing Factors:**

As indicated above WCNOG LER 96-011-00 documents a similar event. The root causes of both errors are currently under investigation. WCNOG will issue a supplement to this LER by January 31, 1997. This supplement will contain a detailed discussion of the root cause of both events.

**Corrective Actions****Immediate:**

The on duty shift supervisor was notified of the concern and the immediate actions taken on October 23, 1996.

The Operation's staff initiated Performance Improvement Request 96-2709 on October 23, 1996, to document the concern, investigation results, and corrective actions implemented.

The Operation's staff initiated a reportability evaluation request (RER 96-036) on October 24, 1996, to assure all reportability aspects of this violation were evaluated.

TSC 033-85 was deleted and removed from the Control Room on November 12, 1996.

The deletion notice for TSC 033-85 was placed in the operations essential reading program on November 13, 1996. 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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The Operation's staff, as part of its investigation activities related to WCNOG LER 96-011-00, performed a detailed review of all developed TSCs to determine the 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 WCNOG will issue additional reviews to document each TSC which resulted in a violation of the actual Technical Specification.

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. WCNOG will supplement this LER no later than January 31, 1997, upon issuance of the IIT report.

**Long Term:**

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

During the initial cause and extent investigation activities associated with WCNOG evaluation of TSC 033-85, it was determined that approximately 50 leak-rate testing procedures referenced this TSC. Each procedure will be revised prior to use; all procedures associated with this TSC will be corrected by July 1, 1997.

**Safety Significance:**

The safety evaluation for the Wolf Creek Generating Station Technical Specification 3.6.1.1 was based on NUREG 0830, "Safety Evaluation Report Related To The Operation Of The Callaway Plant Unit No. 1." Section 6.2.3 of this NUREG describes the requirements for the containment isolation system. For each penetration at least two barriers are required between the containment atmosphere and the outside atmosphere, so that a failure of a single barrier does not prevent isolation.

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The TSC 033-85 allowed for the use of a dedicated operator for maintaining containment integrity during Modes 1, 2, 3 and 4. With dedicated operators at each opening (drain or vent valve) and in direct communication with the control room the ability to ensure a release could be prevented is maintained while meeting the single barrier failure criteria. Procedures also require that if communications with the dedicated operator is lost, the dedicated operator will immediately close the valve they are monitoring. This would indicate that although technical specifications were violated the safety significance of this practice was very small. Had one dedicated operator been unable to close the open valve a second dedicated operator is still available to close the other open valve.

During the operating history of Wolf Creek Generating Station no releases from the containment atmosphere to the outside atmosphere have been experienced during Modes 1, 2, 3 and 4.

Other Previous Occurrences:

LER 96-011-00: WCNO C LER 96-011-00 documents a similar event. The event documented in this LER (96-015-00) was discovered during the evaluation of 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 prevented the occurrence of this event.

Two previous occurrences of containment integrity violations were reported in LER 92-005-00 and LER 92-014-00.

LER 92-005-00: Documents that on February 27, 1992, Surveillance Test Procedure (STS) GP-007 failed to provide adequate restoration instructions. Corrective actions were the revision of STS GP-007 to include the necessary system restoration instructions. The corrective actions associated with this LER would not have prevented the incorrect application of TSC 033-85.

LER 92-014-00: Documents that on August 17, 1992, a cognitive personnel error occurred, in that the individual failed to follow the restoration instructions provided in STS GP-007. Additionally, it was determined the procedural enhancements (human-factoring) were needed. Corrective actions included counseling the individual and enhancements to the procedure. The corrective actions associated with this LER would not have prevented the incorrect application of TSC 033-85.