

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Clay C. Warren
Chief Operating Officer

November 21, 1996

WO 96-0156

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

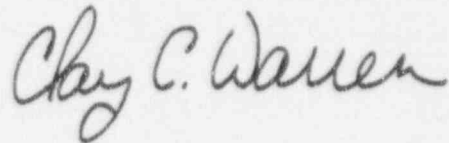
Subject: Docket No. 50-482: Licensee Event Report 96-013-00

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

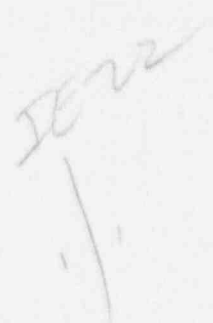
Attachment

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

9611270174 961121
PDR ADOCK 05000482
S PDR

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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 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	00	11	21	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)		TELEPHONE NUMBER (Include Area Code)	
NAME Terry S. Morrill Manager Regulatory Services		316-364-8831-3707	

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		NO	Yes			1	31	97
(If yes, completed EXPECTED SUBMISSION DATE)									

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 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. The root cause of this error is under investigation, and WCNOG LER 96-011-00 will be supplemented by January 31, 1997. Immediate corrective actions included deletion of TSC 005-94 and establishment of Operation's Essential Reading.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)		DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
			YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Wolf Creek Generating Station		05000482	96	013	00	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 violations occurred, Technical Specification Surveillance Requirement 4.8.1.1.2g.7 stated that

"Each diesel generator 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 Specification 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 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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Wolf Creek Generating Station	05000482	96	013	00	3 OF 5

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 presently known. The root cause of this error is under investigation, and LER 96-013-00 will be supplemented by January 31, 1997. This supplement will contain a detailed discussion of the root cause and corrective actions to prevent recurrence.

Root Cause and Corrective Actions:

Root Cause:

As indicated above, the root causes of both errors are currently under investigation. A supplement to LER 96-013-00 will be issued by January 31, 1997. This supplemental will contain a detailed discussion of the root cause and contributing factors.

Corrective Actions

Immediate Corrective Actions:

- The On-duty Shift Supervisor was notified of the concern and the immediate actions taken.
- 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, the investigation's results, and the corrective actions implemented.

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- Operations staff initiated a Reportability Evaluation Request (RER 96-034) to assure all reportability aspects of this violation were evaluated.
- Operations, as part of its investigation activities associated with 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 in this LER (LER 96-013-00) was identified as part of that review. These TSCs are undergoing additional review, and WCNOG will issue reports to document each TSC which resulted in an actual violation of the associated 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 LER 96-013-00, no later than January 31, 1997, upon issuance of the IIT report.

Long Term Corrective Actions:

Corrective actions to prevent recurrence are under evaluation and will be established no later than January 31, 1997. At that time a supplement to LER 96-013-00 will issued. This supplement will provide, in part, the root cause and corrective actions to prevent recurrence.

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.

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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 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 LER (96-013-00) 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.