

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Otto L. Maynard  
President and Chief Executive Officer

April 24, 1997

WM 97-0040

U. S. Nuclear Regulatory Commission  
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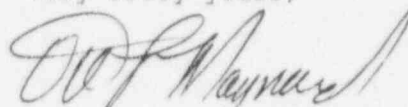
Reference: Letter dated April 4, 1997 from  
T. P. Gwynn, NRC, to O. L. Maynard, WCNOC  
Subject: Docket No. 50-482: Response to Notice of  
Violation 50-482/9705-01

Gentlemen:

This letter transmits Wolf Creek Nuclear Operating Corporation's (WCNOC) response to Notice of Violation 50-482/9705-01. The violation concerns WCNOC's failure to provide timely corrective action to an identified condition adverse to quality involving sample flow through a rotometer on a Component Cooling Water System radiation monitor.

WCNOC's response to this violation is in the attachment. If you have any questions regarding this response, please contact me at (316) 364-8831, extension 4000, or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,



Otto L. Maynard

OLM/jad

Attachment

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

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Reply to Notice of Violation 50-482/9705-01

Violation 50-482/9705-01:

- A. "10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, on or about April 9, 1996, after licensee personnel had identified a condition adverse to quality involving the sample flow through the component cooling water heat exchanger radiation monitor rotometer being repeatedly off-scale, the underlying design error was not promptly corrected."

This is a Severity Level IV violation (Supplement 1) (50 482/9705-01)."

Admission of Violation:

Wolf Creek Nuclear Operating Corporation (WCNOC) acknowledges and agrees that a violation of Criterion XVI occurred when an Updated Safety Analysis Report (USAR) error was not promptly corrected.

Reason for Violation:

Updated Safety Analysis Report (USAR) Table 11.5-1 shows a sample flow rate of 1-5 gallons per minute (gpm) for radiation monitors EGRE0009 and EGRE0010. Related USAR Section 11.5.2.2.2 states "Each detector assembly receives a **continuous** sample flow..." and, USAR section 11.5.2.1.9 states, "The **expected** ranges of system parameters, such as flow, composition, and concentrations, are summarized in Tables 11.5-1 through 11.5-4."

An operator noticed that no flow was evident through the radiation monitors and wrote Performance Improvement Request (PIR) 96-1129. The PIR evaluation found that for normal system lineups, the radiation monitor sample flows are within the 1-5 range. The PIR did not address sample flows outside the "expected" range, less than 1 gpm, but recognized that they would occur. It was recognized that a radiation monitor sample flow would be present or "continuous" at all times when a Component Cooling Water System (CCWS) pump is running. The radiation monitor will perform its intended function when "continuous" flow of  $\leq 1$  gpm is present. PIR 96-1129 did not clarify or correct the USAR nor were any hardware or procedure changes initiated.

At the time that PIR 96-1129 was dispositioned, the engineer believed that the intent of the USAR was being met and that a condition requiring corrective action did not exist due to other clarifying statements in the USAR. The engineer also recognized that calculation M-EG-13 did not support a sample flow of 1 gpm but considered this unimportant since actual flow was observed to be  $\geq 1$  gpm for all normal lineups.

PIR 97-0457 was written to identify that sample flow rates less than 1 gpm were achievable in some infrequent lineups contrary to the USAR Table range of 1-5 gpm. The root cause evaluation performed for PIR 97-0457 determined that there was a lack of a strict literal compliance culture during the evaluation and closure of PIR 96-1129.

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Corrective Steps Taken and Results Achieved:

WCNOC chartered Incident Investigation Team (IIT) 96-004 to evaluate problems uncovered in the Technical Specification Clarification program related to literal compliance. The IIT determined that there was a misalignment between the Wolf Creek organization culture and the regulatory environment. The corrective actions from the IIT were docketed in WCNOC letter WO 97-0011, dated January 31, 1997, from Clay C. Warren to the NRC. The corrective actions included training sessions with all departments communicating management's expectations.

The potential for a sample flow rate less than 1 gpm in an operating train only exists in the winter, when the CCWS heat exchanger temperature control valve is full open. Therefore the following corrective actions are scheduled to be completed prior to winter, 1997.

USAR Table 11.5-1 and calculation M-EG-13 will be revised by September 1, 1997, to reflect that the actual sample flow rates may be less than 1 gpm during some infrequent operational line-ups.

Procedure SYS EG-120, "Component Cooling Water System," will be revised by September 1, 1997, to add a note clarifying that the CCWS radiation monitor sample flow may be less than the range of the monitor's flow indicator under certain operating conditions.

WCNOC is committed to maintaining Wolf Creek's licensing and design bases as defined in 10 CFR 50.2, and is addressing the generic issue of USAR fidelity by performing a review of the USAR. The review was committed to and formally docketed in Letter ET 97-0010, dated February 7, 1997, from R. A. Muench to the NRC.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by September 1, 1997.