

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Clay C. Warren
Chief Operating Officer

June 27, 1997

WO 97-0064

U. S. Nuclear Regulatory Commission
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Washington, D. C. 20555

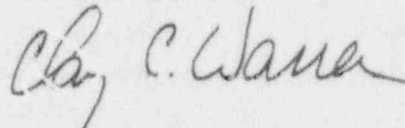
Subject: Docket No. 50-482: Licensee Event Report 97-011-00

Gentlemen:

The attached Licensee Event Report (LER) 97-011-00 documents a Technical Specification violation. This LER is being reported pursuant to 10 CFR 50.73(a)(2)(i)(B).

If you should have any questions regarding this submittal, please contact me at (316) 364-8831 extension 4485, or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,



Clay C. Warren

CCW/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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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 4

TITLE (4)

Technical Specification Violation Occurred During Calorimetric Adjustments

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
5	25	97	97	011	00	6	27	97	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)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)		
45 percent		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

Richard D. Flannigan
Manager Nuclear Engineering, Safety, and Licensing

TELEPHONE NUMBER (Include Area Code)

316-364-4500

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

X NO

ABSTRACT:

Technical Specification 4.3.1.1, Table 4.3-1, Power Range, Neutron Flux High Setpoint Note 2, states, "Comparison of calorimetric to excore power indication above 15 percent of RATED THERMAL POWER. Adjust excore channel gains consistent with calorimetric power if absolute difference is greater than 2 percent..." This Technical Specification was inadvertently violated when procedure changes were made contrary to this Technical Specification and then implemented during a return to power after a forced outage. The root cause is personnel error during the procedure revision and regulatory screening process. Corrective actions include revision of the procedure to concur with the Technical Specification and counseling of the individuals involved.

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	97	011	00	2 OF 4

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 = 10 percent

Basis for Reportability:

On June 4, 1997 it was identified that during startup activities on May 25, 1997, the Nuclear Instrumentation System (NIS) [IG] was not adjusted to match the calorimetrics when the power level was greater than 15% as required by Technical Specification Table 4.3-1.

Table 4.3-1, Note 2 states:

Comparison of calorimetric to excore power indication above 15% of RATED THERMAL POWER. Adjust excore channel gains consistent with calorimetric power if absolute difference is greater than 2%.

The failure to comply with Technical Specification requirements is reportable per 10 CFR 50.73(a)(2)(i)(B).

Description of Event:

Surveillance procedures STS SE-001, "Power Range Adjustment to Calorimetric," and STS SE-002 "Manual Calculation of Reactor Thermal Power," were revised in July 1996 in response to a recommendation contained in Westinghouse Technical Bulletin ESBUTB-92-14-R1. The Technical Bulletin discusses potential inaccuracies in Feedwater Flow Calorimetrics at low power levels. Recommendation #6 which applies only to power levels below 70% Rated Thermal Power (RTP) contains the following statement:

"If the NIS indicated power is greater than the calorimetric indicated power and the calorimetric power level is less than 70% RTP, the NIS channels should not be corrected by introduction of a gain shift to reflect the calorimetric."

Prior to revision, procedures STS SE-001 and STS SE-002 required NIS channel gain adjustments whenever the absolute difference between NIS indicated power and calorimetric calculated power was greater than 2% RTP. This complied with Technical Specification (TS) NIS surveillance requirements in TS Table 4.3-1, Note 2 which states:

Comparison of calorimetric to excore power indication above 15% of RATED THERMAL POWER. Adjust excore channel gains consistent with calorimetric power if absolute difference is greater than 2%.

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

Conflict between T/S Table 4.3-1 Note 2 and the Technical Bulletin Recommendation #6 exists because Recommendation #6 does not allow NIS indicated power to be adjusted downward, to be consistent with a lower calorimetric power, below 70% RTP. Both procedures contain a clear statement that performance satisfies the requirements in T/S Table 4.3-1; however, the preparer, reviewers, and the approvers of the Regulatory Screenings for the procedure revisions, failed to identify the conflict between the proposed procedure changes and the T/S surveillance requirement in Table 4.3-1. The Regulatory Screening specifically asks if the change would result in a revision to the Operating License including Technical Specifications.

The NIS System Engineer in Nuclear Engineering, who suggested the procedure changes, was aware of the potential for conflict, but after discussions with engineers at another facility, he erroneously concluded that the procedure changes did not constitute a conflict with requirements of T/S Table 4.3-1. As a result, in his communications with the preparer and approver of the Regulatory Screening he did not mention the conflict potential.

Due to the procedure changes, during startup activities on May 25, 1997 from a forced outage, the NIS was not adjusted to match the calorimetrics when the power level was greater than 15% as required by T/S Table 4.3-1. The failure to adjust the NIS occurred during a calibration at a calorimetric power level of 45% during the power ascension. On June 4, 1997, during a review of the forced outage activities it was identified that literal compliance with the Technical Specifications was not met.

Root Cause:

The root cause of this event is personnel error due to inadequate work practices in that the Regulatory Screening was prepared and approved with incorrect conclusions regarding impact of proposed changes on Technical Specifications.

Corrective Actions:

The changes to procedures STS SE-001 and STS SE-002, were removed by On-The-Spot-Changes (OTSC) 97-0254 for STS SE-002 and OTSC 97-0255 for STS SE-001.

Individuals involved in preparation, review or approval of the associated Regulatory Screening will be assigned this report as required reading, will be counseled by their supervisors regarding the changes in their work practices which are needed to prevent recurrence. This action will be completed by July 15, 1997.

The individual in Nuclear Engineering who prepared Performance Improvement Request (PIR) 96-1066, which implemented recommendation #6 as a corrective action, will also be assigned this report as required reading. This individual will submit to his supervisor a written statement detailing how, given a similar work assignment today, his work practices would be different and a recurrence of the error would be prevented. This action will be completed by July 15, 1997.

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TEXT CONTINUATION

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The necessity of literal compliance with all regulatory requirements, including Technical Specifications, has been communicated to all Wolf Creek employees through site wide meetings led by plant management. AP 15C-002, "Procedure Use and Adherence", has been revised (Rev.8, dated May 21, 1997) to include a definition of literal compliance. This definition is intended to aid employees in evaluating proposed changes.

Site distribution of letter EN 97-0014, dated June 19, 1997, from senior management reinforced the definition of literal compliance as stated in OTSC 97-0205 to AP 15C-002.

A Design Basis/Licensing Basis Review Team has been developed to examine WCNOG processes that could impact design basis, license basis and USAR fidelity and recommend improvements in these processes as appropriate. This effort will address generic issues to reduce the possibility of occurrence of events such as the issue in this PIR. This program is in effect immediately based on letter ET-97-0064, dated June 16, 1997.

Safety Significance:

The safety significance of this event was low because the effect of the procedure changes in STS SE-001 and STS SE-002, per Recommendation No. 6 of ESBU-TB-92-14-R1, is more conservative operation, not less. The procedure changes were removed from the surveillance procedures. Subsequent procedure changes were made to address the issues of the Technical Bulletin while still adhering to Technical Specification 4.3-1 Note 2.

Other Previous Occurrences:

There have been no other similar occurrences.