

WOLF CREEK

NUCLEAR OPERATING CORPORATION

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NO 90-0120

U. S. Nuclear Regulatory Commission
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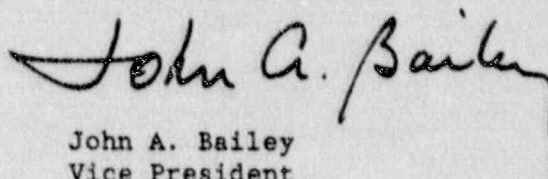
Reference: Letter dated March 16, 1990 from S. J. Collins, NRC,
to B. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Violation 482/9005-01,
02 and 03

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) response to violation 482/9005-01, 02 and 03 which were documented in the Reference. Violation 482/9005-01 involved inadequate corrective action, violation 482/9005-02 involved an inoperable auxiliary feedwater pump and violation 482/9005-03 involved a failure to follow procedure.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff.

Very truly yours,



John A. Bailey
Vice President
Nuclear Operations

JAB/jra

Attachment

cc: R. D. Martin (NRC), w/a
D. Persinko (NRC), w/a
D. V. Pickett (NRC), w/a
M. E. Skow (NRC), w/a

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Violation 482/9005-01: Inadequate Corrective Action

Criterion XVI of 10 CFR, Part 50, Appendix B, corrective actions, requires, in part, that measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

On December 15, 1988, the licensee was issued Notice of Violation 482/8827-04, for failure to test certain safety-related check valves. On January 16, 1989, the licensee responded, stating that the check valves would be included in a testing program, and that by December 29, 1989, a review to identify similar components would be completed.

Contrary to the above, during the month of February 1990, while reviewing the licensee's corrective action for Violation 482/8827-04, the inspector identified: (1) that even though the check valves were added to the test program, four of them were not going to receive a test; and (2) there were other similar components that should have been added to the testing program (e.g., air check valves to the main steam and main feedwater isolation valves) that the licensee failed to identify.

Reason For Violation:

The corrective action associated with violation 482/8827-04 included the incorporation of 16 nitrogen supply and instrument air system supply check valves into the Inservice Testing (IST) Program. The IST Program was revised on May 5, 1989. At that time it was determined that the four nitrogen supply check valves were passive which resulted in no testing being required for these valves.

Additional corrective action for violation 482/8827-04 included a review of similar components in other systems to ensure that appropriate testing requirements are being applied. The air check valves to the main steam and main feedwater isolation valves were reviewed as part of the corrective action and a determination made that these valves were not required to be tested in accordance with ASME Section XI.

Corrective Steps Which Have Been Taken And Results Achieved:

A further review of the function of the turbine driven auxiliary feedwater pump discharge valves identified that these valves are normally open and their safeguards fail safe position is open. The motor driven auxiliary feedwater pump discharge valves are the valves that are required to mitigate transients. These valves automatically throttle to limit total auxiliary feedwater flow to 320,000 lbm/hr. The motor driven auxiliary feedwater discharge valves are tested to fulfill this function. The closing of the turbine driven auxiliary feedwater pump discharge valves by a safety-related nitrogen source is a function that WCNOG feels is prudent to verify and will revise an existing procedure to test the four nitrogen supply check valves.

The air check valves to the main steam and main feedwater isolation valves were added to the Preventative Maintenance Program in December, 1989, which requires a valve operability test be performed every refueling outage.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The above corrective steps which have been taken will avoid further violations and no additional corrective steps are planned.

Date When Full Compliance Will Be Achieved:

The procedure to test the four nitrogen supply check valves will be revised by June 15, 1990.

Violation (482/9005-02): Inoperable Auxiliary Feedwater Pump

Finding:

Technical Specification (TS) requires that written procedures shall be established, implemented, and maintained covering those activities recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. RG 1.33 requires, in part, that there be procedures covering the authorities and responsibilities for safe operation and shutdown.

WCGS Administrative Procedure (ADM) 02-004, Revision 7, "Supervising Operator Qualifications and Responsibilities", has been established and implemented in accordance with RG 1.33. Step 3.2 of ADM 02-004 requires that the supervising operator maintain a detailed up-to-date knowledge of the conditions and limitations in the plant operating license and TS.

Contrary to the above, on February 07, 1990, the inspectors observed the turbine speed controller for the turbine driven auxiliary feedwater pump set so low as to make the pump incapable of performing its safety function, and no licensed operator (including the supervising operator) was aware of the pump's condition.

Reason For Violation:

Following a reactor trip on February 07, 1990, the Balance of Plant operator (BOP), who is a licensed operator, throttled back on the speed controller for the turbine driven auxiliary feedwater pump after steam generator levels had returned to normal. The BOP operator initially throttled back on the auxiliary feedwater pump discharge valves, but since the reactor coolant system temperature was still decreasing, he throttled back on the speed controller to decrease steam removal from the steam generator to stabilize reactor coolant system temperature. Following the recovery from the reactor trip, the BOP operator neglected to restore the speed controller to normal. No other on-shift licensed personnel realized the speed controller had been throttled back and therefore were unaware of the pump's condition.

Corrective Steps Which Have Been Taken And Results Achieved

Following notification by the NRC inspector that the speed controller for the turbine driven auxiliary feedwater pump was improperly set low, Control Room personnel set the speed controller at 3900(+0 -50)RPM.

Procedure STS CR-001, "Shift Logs For Modes 1, 2, and 3," has been revised to verify the turbine driven auxiliary feedwater pump speed controller is set at 3900 (+0 -50) RPM. Procedure GEN 00-005, "Plant Shutdown From 20% Minimum Load To Hot Standby," has been revised to verify the turbine driven auxiliary feedwater pump speed controller is set at 3900 (+0 -50) RPM and that the auxiliary feedwater pump discharge valves are in the full open standby position.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The above corrective steps which have been taken will avoid further violations and no additional corrective steps are planned.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.

Violation (482/9005-03): Failure To Follow Procedure

Finding:

TS requires that written procedures shall be established, implemented, and maintained covering those activities recommended in Appendix A of RG 1.33, Revision 2, February 1978. RG 1.33 requires, in part, that there be procedures covering performing maintenance.

Procedure ADM 01-057, Revision 15, "Work Request," Section 2.1, requires that work requests will be used to control work performed in plant systems.

Contrary to the above, on February 13, 1990, the inspector observed licensee personnel working on Load Center Supply Transformer XPG22, without an authorized work request.

Reason For Violation:

During a preventive maintenance inspection of Load Center Supply Transformer XPG22 in accordance with Work Request (WR) 52829-89 a winding spacer was found at the base of the transformer winding. Corrective WR 00314-90 was initiated on January 16, 1990 to remove the transformer covers and perform a more detailed inspection of the winding spacer problem. On February 13, 1990 a clearance order was hung including the installation of ground wires in accordance with procedure ADM 02-100, "Clearance Order Procedure". The electrical maintenance personnel involved in removing the transformer covers and installing the ground wires were not aware that a work request had been initiated for this inspection activity which resulted in not obtaining on the work request the shift supervisors permission to start the activity.

Corrective Steps Which Have Been Taken And Results Achieved:

Work Request (WR) 00314-90 was located and documented permission to start work was obtained and taken to the job site. Electrical Maintenance Supervision instructed electrical maintenance personnel of the requirement in procedure ADM 71-057, "Work Request", to have the appropriate work controls at the job site when performing work or inspection activities.

Maintenance and Modification Bulletin No. 45 was issued to Maintenance and Modification Supervisors/Leads to stress further the procedural requirements to have in possession the authorized work controls when performing work or inspection activities.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The above corrective steps which have been taken will avoid further violations and no additional corrective steps are planned.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.