UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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ARLINGTON, TEXAS 76011-8064

February 6, 2001

MEMORANDUM TO: Ledyard B. Marsh, Chief
Events Assessment, Generic Communications,
and Non-Power Reactors Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

FROM: Ken E. Brockman, Director, Division of Reactor Projects ***/RA/***

SUBJECT: FAILURE TO SCOPE NONSAFETY-RELATED EQUIPMENT HATCH MOTORS IN THE MAINTENANCE RULE PROGRAM

This memorandum is to highlight a safety concern identified at the Wolf Creek Nuclear Generating Station that may have generic implications for other licensees. On October 3, 2000, while reviewing the licensee's contingency plans for closing the containment building equipment hatch, the inspectors identified that the nonsafety-related equipment hatch motors were necessary for the licensee to attain successful containment closure in the event of a transient. 10 CFR 50.65(b)(2)(i) and (ii) state in part that nonsafety-related components that are relied upon to mitigate transients or whose failure could prevent safety-related structures from fulfilling their safety-related function should be included in the scope of the maintenance rule monitoring program. It was then identified that the equipment hatch motors had not been included in the scope of the maintenance rule program. In addition, the licensee identified that a function for containment closure had not been developed under which the equipment hatch motors would be scoped.

Although it was concluded that the safety significance of this issue was minimal, this issue points out an area that was overlooked during the development of the licensee's Maintenance Rule program. The importance that some nonsafety-related equipment may have in guaranteeing that selected safety-related components perform their safety-related functions requires that appropriate attention be applied to these nonsafety-related components to guarantee their performance.

Compounding the significance of this finding was the fact that the licensee did not have any contingency plans or procedures for achieving containment closure in the event that one or both of the equipment hatch motors failed. Without such guidance, the licensee would not have had the equipment available to guarantee containment closure within the 4-hour time limit requirement set forth in Technical Specifications 3.9.5A.4 and 3.9.6B3, "Refueling Operations." Neither would the licensee have been able to achieve containment closure within 30 minutes, which the licensee committed to in its amended response to Generic Letter 88-17, "Loss of Decay Heat Removal," for a loss-of-coolant transient while operating at reduced inventory with the equipment hatch open. Failure to close the equipment hatch in a timely manner would result in the inability of the containment building to mitigate the consequences of a transient.

The issue of failing to scope the equipment hatch motors in the maintenance rule program is proposed for consideration as the topic of an information notice. An excerpt from NRC Inspection Report 50-482/00-09 is attached for your information. Please contact Bill Johnson at (817) 860-8148 if you have any questions.

Attachment:
NRC Inspection Report 50-482/00-09 (excerpt)

cc w/attachments via ADAMS:
E. Goodwin, REXB **(EFG)**
K. Brockman, D:DRP **(KEB)**
A. Howell, D:DRS **(ATH)**
W. Johnson, C:DRP/B **(WDJ)**
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F. Brush, SRI, Wolf Creek **(FLB2)**
D:DRP, Regions I, II, and III **(ARB, LRP, GEG)**
S. Morris, EDO Coordinator **(SAM1)**

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RIV:PE:DRP/B	C:DRP/B	D:DRP		
RVAzua;df	WDJohnson	KEBrockman		
WDJohnson for	***/RA/***	***/RA/***		
2/6/01	2/6/01	2/6/01		

OFFICIAL RECORD COPY T=Telephone E=E-mail F=Fax

Attachment

Excerpt from NRC Inspection Report 50-482/00-09

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors reviewed the licensee's maintenance rule implementation for functional failure evaluations to assess the effectiveness of maintenance efforts that apply to the following scoped structures, systems, and components:

- Feedwater isolation valve
- Emergency diesel generator - diesel output breaker
- Emergency diesel generator - fuel injector leak off
- Emergency diesel generator - governor mechanical actuator
- Residual heat removal system
- Containment closure equipment

The inspector's review included the following information:

- Maintenance rule bases information
- Maintenance rule expert panel meeting minutes
- Functional failure determination checklists

b. Findings

The inspectors identified the failure to include the containment building equipment hatch motors in the scope of the maintenance rule program as a minor violation with possible generic implications.

On October 3, 2000, while reviewing the licensee's contingency plans for closing the containment building equipment hatch, the inspectors identified that the nonsafety-related equipment hatch motors were necessary for the licensee to attain successful containment closure in the event of a transient. 10 CFR 50.65(b)(2)(i) and (ii) state in part that nonsafety-related components that are relied upon to mitigate transients or whose failure could prevent safety-related structures from fulfilling their safety-related function should be included in the scope of the maintenance rule monitoring program. The inspectors questioned the licensee about whether the equipment hatch motors, which were needed to close the equipment hatch, were monitored under the maintenance rule program. The licensee indicated that the equipment hatch motors had not been included in the scope of the maintenance rule program. In addition, the licensee identified that a function for containment closure had not been developed under which the equipment hatch motors would be scoped.

In addition, the licensee did not have any contingency plans or procedures for achieving containment closure in the event that one or both of the equipment hatch motors failed. Without such guidance, the licensee would not have had the equipment available to guarantee containment closure within the 4-hour time limit requirement set forth in Technical Specifications 3.9.5A.4 and 3.9.6B3, "Refueling Operations." Neither would

the licensee have been able to achieve containment closure within 30 minutes, which the licensee committed to in its amended response to Generic Letter 88-17, "Loss of Decay Heat Removal," for a loss-of-coolant transient while operating at reduced inventory with the equipment hatch open. Failure to close the equipment hatch in a timely manner would result in the inability of the containment building to mitigate the consequences of a transient.

The failure to include the containment building equipment hatch motors within the scope of the licensee's maintenance rule program is not considered to have a credible impact on safety and as a result is considered a minor violation of 10 CFR 50.65(b)(2)(i) and (ii). Although this issue should be corrected, it constitutes a violation of minor significance that is not subject to enforcement action in accordance with Section IV of the NRC's Enforcement Policy. A minor violation would normally not be documented. However, the issue addresses a weakness that may be present at other facilities. As a result, this issue is being documented as a potential generic safety concern. This minor violation is in the licensee's corrective action program as Performance Improvement Requests 2000-2901 and -3340.