

Donna Jacobs Plant Manager

JUN 1 7 2002

WO 02-0030

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

Subject: Docket No. 50-482: Licensee Event Report 2002-002-00, Technical Specification Violation

Gentlemen:

The enclosed Licensee Event Report (LER) 2002-002-00 is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B). On April 25, 2002, Wolf Creek Generating Station (WCGS) entered Mode 3 from Mode 4 contrary to Technical Specification Limiting Condition for Operation (LCO) 3.0.4, which specifies that the plant cannot change modes when LCO is not met. A mode change was made with the Reactor Coolant System unidentified leakage exceeding the Technical Specification limit.

Wolf Creek Nuclear Operating Corporation has made no commitments in the enclosed LER.

If you should have any questions regarding this submittal, please contact me at (620) 364-4246 or Mr. Tony Harris at (620) 364-4038.

Very truly yours,

Donna Jacobs

DJ/rlr

Enclosure

cc: J. N. Donohew (NRC), w/e D. N. Graves (NRC), w/e E. W. Merschoff (NRC), w/e Senior Resident Inspector (NRC), w/e

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NRC FORM 366 U.S. NUCLEAR REGULATORY							APPROVED BY OMB NO. 3150-0104 EXPIRES 7-31-2004										
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NRC FORM 366AU.S. NUCLEAR REGULATORY COMMISS	ION								
LICENSEE EVENT REPORT (LER)									
1. FACILITY NAME	2. DOCKET		6. LER NUMBER		·	3. PAGE			
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER					
WOLF CREEK GENERATING STATION	05000482	2002	002 -	- 00	2	OF	3		
17. NARRATIVE (If more space is required, use additional co	pies of NRC Form 3	366A)							
Plant Conditions Prior to the Event:									
MODE – 4 Power 0 percent Temperature and Pressure – 350 degrees; 3	90 psig								
Event Description:									
On April 24, 2002, at 2023 hours, while in Mo personnel completed surveillance procedure operator performing the calculation rounded The calculation resulted in a value less than Operational LEAKAGE," limit of 1.0 gpm for I unidentified leakage.	ode 4, Wolf Cr STS BB-004, the pressurize the required T Reactor Coola	eek Nucle "Reactor ' r level initi echnical S nt System	ar Operating Water Invent ial and final r Specification (RCS) (EIIS	Corporat ory Balan eadings to (TS) 3.4.1 system c	ion (W ce." T o whol I3, "R(ode A	/CNOC The lice le numb CS B)	;) nsed pers.		
On April 25, 2002, at 0712 hours, Wolf Creel Subsequently on April 25, 2002, the Surveilla on April 24, 2002, and identified a calculation RCS unidentified leakage had been exceede gpm above the TS limit.	k Generating S ance Coordina n error. A reca ed. The unider	Station (W tor review Ilculation c ntified leat	CGS) entere ed the STS E letermined th (age was act	d Mode 3 3B-004 pro at the TS ually 1.09	from f ocedu limit o 1 gpm	Mode 4 re perfo of 1.0 g 1, or .09	ormed pm 91		
On April 25, 2002, at 2300 hours, the Contro Action A.1, to reduce RCS leakage to within	l Room Shift N limits within fo	lanager e ur (4) hou	ntered TS 3.4 rs.	4.13, Con	dition	A, Req	uired		
On April 25, 2002, at 2326 hours, WCNOC p vent and drain piping sections. Chemical Vo BGV0346, 0273, 0271, and 0272 were close	personnel iden Jume and Con d an additiona	tified leaka Itrol (BG s Il ¾ turn e	age past the ystem) (EIIS ach.	"A" Seal I system co	njectio ode Cl	on Filter B) valve	r to the es		
On April 26, 2002, at 0300 hours, Control Room personnel entered TS 3.4.13, Condition B, due to an inability to verify RCS leakage within the four (4) hours specified by Required Action A.1. Condition B was entered because steady state plant conditions could not be achieved for performing surveillance test STS BB-004. The RCS water inventory balance calculation is performed at steady state conditions to provide an accurate indication of RCS leakage. Required Action B.2 requires the plant to be in Mode 5 within 36 hours. Procedure STS BB-004 was performed satisfactorily after achieving steady state plant conditions. On April 26, 2002, at 1010 hours, Control Room personnel exited Condition B of TS 3.4.13 since LCO 3.4.13 was met.									
Basis for Reportability:									
TS LCO 3.0.4 states: "When an LCO is not Applicability shall not be made except when operation in the MODE or other specified con Specification shall not prevent changes in Ma required to comply with ACTIONS or that are	met, entry into the associated ndition in the A ODES or othe e part of a shut	a MODE ACTION Applicabilit r specified tdown of th	or other spec S to be enter y for an unlin I conditions in ne unit."	cified cond ed permit nited peric n the Appl	dition i contir od of ti licabili	in the nued ime. Th ty that a	iis are		
Entry into Mode 3 with RCS leakage greater 3.0.4. Violation of LCO 3.0.4 is reportable powas prohibited by the plant's Technical Spec	than 1.0 gallo er 10 CFR 50. cifications." Nl	ns per mir 73(a)(2)(i) JREG 102	nute constitut (B), "Any ope 22, "Event Re	ed a viola eration or porting G	tion o condit uidelir	f TS LC ion whi nes, 10	Ch CFR		

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NRC FORM 366AU.S. NUCLEAR REGULATORY COMMISSION (1-2001) LICENSEE EVENT REPORT (LER)							
1. FACILITY NAME	2. DOCKET	1	6. LER NUMBER		3. F	AGE	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
WOLF CREEK GENERATING STATION	05000482	2002	002 -	- 00	3 0	F 3	
17. NARRATIVE (If more space is required, use additional c	copies of NRC Form 3	866A)					

50.72 and 50.73," Revision 2, further explains: LCO statements that include action statements (required actions and associated completion time in TS) provide constraints on the length of time that components or systems may remain inoperable or out of service before the plant must be shut down or other compensatory measures must be taken. In this event, the required LCO was not met, so compensatory measures were taken to correct the violated TS.

Root Cause:

The root cause of this event has been determined to be inadequate procedural guidance to ensure consistent results of RCS leakage calculations. Relevant procedures contained no guidance on significant digits and rounding, nor is that guidance included in any of the Licensed Operator classes.

Corrective Actions:

As an immediate action, Control Room personnel entered appropriate Conditions/Required Actions of TS 3.4.13, "RCS Operational LEAKAGE." This returned the plant to compliance with TS. WCNOC personnel identified leakage on the "A" Seal Injection Filter to the vent and drain piping sections. Valves BGV0346, 0273, 0271, and 0272 were closed an additional ³/₄ turn each. The surveillance procedure was performed again and the RCS unidentified leakage was less than the TS limit of 1.0 gpm for unidentified leakage.

Additional corrective actions to address the root cause of this event are being addressed in the WCNOC corrective action program. The first corrective action is to revise surveillance procedure STS BB-004 to provide additional calculational guidance to determine unidentified RCS leakage. The second corrective action is that the Licensed Operator training lesson plans will be evaluated for enhancement.

Safety Significance:

The safety significance of this event is low. At the time of this event, all mitigating systems were functional. Systems that would have provided indications of excessive leakage were operable. Various indicators of different levels of the water inventory remained functional throughout the event and would have detected increased inventory loss. Pursuant to TS, RCS leakage is calculated at least every 72 hours.

The actual RCS leak rate was minor. The allowed unidentified leakage is 1.0 gpm; the actual amount was 1.091 gpm, which existed for approximately 30 hours from the time of the first test completion to the leakage identification.

Previous Events

No previous events of inadequate procedural guidance causing a calculational error leading to a TS violation were identified.