

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Stephen E. Hedges
Vice President Operations and Plant Manager

January 13, 2006

WO 06-0003

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

Subject: Docket No. 50-482: Licensee Event Report 2005-006-00

Gentlemen:

The enclosed Licensee Event Report (LER) 2005-006-00 is being submitted pursuant to 10 CFR 50.73(a)(2)(ii)(B) regarding an unanalyzed condition related to loss of RCP seal cooling during an Appendix R fire event.

Commitments made by Wolf Creek Nuclear Operating Corporation in the enclosed LER are identified in the Attachment to this letter.

If you have any questions concerning this matter, please contact me at (620) 364-4190, or Mr. Kevin Moles at (620) 364-4126.

Very truly yours,



Stephen E. Hedges

SEH/rlt

Attachment
Enclosure

cc: J. N. Donohew (NRC), w/a, w/e
W. B. Jones (NRC), w/a, w/e
B. S. Mallett (NRC), w/a, w/e
Senior Resident Inspector (NRC), w/a, w/e

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LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Kevin Moles, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4126.

COMMITMENT	Due Date/Event
Procedure OFN RP-017 will be revised to remove steps for restoration of RCP cooling.	6/2/2006

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME WOLF CREEK GENERATING STATION	2. DOCKET NUMBER 05000 482	3. PAGE 1 OF 3
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4. TITLE
Unanalyzed Condition Related to Loss of RCP Seal Cooling during a postulated Appendix R Fire Event

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
11	16	2005	2005	006	00	01	13	2006		05000
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE 1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: (Check all that apply)										
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)							
10. POWER LEVEL 100	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)							
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)							
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)							
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)							
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER							
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A							

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME Kevin J. Moles, Manager Regulatory Affairs	TELEPHONE NUMBER (Include Area Code) (620) 364-4126
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO			

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On November 16, 2005, conditions were discovered where a postulated fire could cause the loss of a safe shut down success path.

During a timed walk down of an Off Normal Operations procedure for shut down outside the Control Room, the demonstrated response time for restoring Reactor Coolant Pump (RCP) seal cooling did not meet the required time. Failure to restore the RCP seal cooling in an appropriate time could result in damage to the RCP seals. Failure of the RCP seals could result in an inability to maintain pressurizer level during plant shutdown, thus not satisfying the 10CFR50 Appendix R, Section III.L.2.b requirement.

A 1-hour fire watch was implemented in the Control Room.

LICENSEE EVENT REPORT (LER)

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		2005	-- 005	-- 00	

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

Background:

The reactor coolant pump (RCP) [EIS Code: AB] seal assembly [EIS Code: SEAL] provides for controlled leakage of Reactor Coolant System water. A fire has the potential to cause a loss of cooling to the RCP seals. Failure to restore the RCP cooling in an appropriate time could result in damage to the RCP seals. Failure of the RCP seals could result in an inability to maintain pressurizer level during plant shutdown, thus not satisfying the 10CFR50 Appendix R, Section III.L.2.b requirement.

Plant Conditions Prior to the Event:

MODE – 1
Power – 100 percent
Normal Operating Temperature and Pressure

Event Description:

Wolf Creek Generating Station (WCGS) originally committed to restoring seal injection to the RCP seals within 30 minutes, after evacuating the control room, to protect the RCP seals.

In 1986, WCAP 10541, documented that the lower RCP internals water volume would provide limited cooling to the seals for approximately 13 minutes following loss of all seal cooling. Previous timing of procedure OFN RP-017, Control Room Evacuation, had shown that RCP seal injection could be restored within 13 minutes so no additional actions were taken by WCGS.

A Westinghouse Direct Work Request, DW-94-011, made a recommendation that seal cooling never be restored if the RCP Vendor Manual limits cannot be met. However, it did not prohibit restoration of seal cooling if circumstances require and allow. Based on timing performed during training, WCGS had always met the RCP Vendor Manual limits.

In January of 2005, Westinghouse issued WCAP-16396-NP, "Reactor Coolant Pump Seal Performance for Appendix R Assessments". In this document, Westinghouse stated that the maximum RCP seal leakage would be limited to 21 gpm if RCP seal cooling were not restored and a natural circulation cool down were completed.

In June 2005, Information Notice IN 2005-14, Fire Protection Findings on Loss of Seal cooling to Westinghouse Reactor Coolant Pumps, was issued and discussed the finding of WCAP-16396-NP. With the receipt of IN 2005-14, WCGS decided to implement the methodology of not restoring RCP seal cooling following a complete loss of seal cooling. However, the procedure revision has not yet been issued.

During the November 2005 NRC triennial inspection, the actions of procedure OFN RP-017 were timed using a more conservative approach than previously used at WCGS. Using this conservative approach, RCP seal cooling would not be restored until 20 minutes after evacuation from the control room. At that point, an eight hour non-emergency report to the NRC Operations Center was made in accordance with 10CFR50.72(b)(3)(ii)(B).

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		2005	-- 005	-- 00	

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

Basis for Reportability:

Failure to restore the RCP cooling, after a postulated fire, in an appropriate time could result in damage to the RCP seals. Failure of the RCP seals could result in an inability to maintain pressurizer level during plant shutdown, thus not satisfying the 10CFR50 Appendix R, Section III.L.2.b requirement. Based on this information, WCNOG made an eight hour Emergency Notification System call in accordance with 10 CFR 50.72(b)(3)(ii)(B).

This condition is also reportable pursuant to 10 CFR 50.73(a)(2)(ii)(B) for any event or condition that resulted in the nuclear power plant being in an unanalyzed condition that significantly degraded plant safety.

Root Cause:

Wolf Creek's license basis committed to account for only one spurious signal and does not require the scenario of additional spurious signals.

Corrective Actions:

Procedure OFN RP-017 will be revised to remove steps for restoration of RCP seal cooling.

Safety Significance:

A fire in the control room could adversely affect safety systems to perform their intended function. There is a potential for core damage if RCP seal integrity is not maintained or restored. The loss of coolant through the RCP seals could exhaust fluid level in the reactor system and potentially cause core damage.

A fire, causing the evacuation of the control room, did not occur. This condition resulted in no significant safety consequences and the health and safety of the public were not affected at any time.

Operating Experience/Previous Events:

None