

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Stephen E. Hedges
Vice President Oversight

July 3, 2008

WM 08-0016

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

Subject: Docket No. 50-482: Licensee Event Report 2008-006-00, Entry Into
Mode 4 Without An Operable Containment Spray System

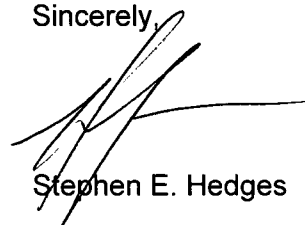
Gentlemen:

The enclosed Licensee Event Report (LER) 2008-006-00 is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) regarding a condition prohibited by Technical Specifications at Wolf Creek Generating Station.

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. Richard D. Flannigan at (620) 364-4117.

Sincerely,



Stephen E. Hedges

SEH/rlt

Attachment

Enclosure

cc: E. E. Collins (NRC), w/a, w/e
V. G. Gaddy (NRC), w/a, w/e
B. K. Singal (NRC), w/a, w/e
Senior Resident Inspector (NRC), w/a, w/e

JE22
NRK

LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation in this document. Any other statements in this letter are provided for information purposes and are not considered regulatory commitments. Please direct questions regarding these commitments to Mr. Richard Flannigan, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4117.

REGULATORY COMMITMENT	DUE DATE
A method for reviewing Open Work Orders against Technical Specification related systems before making an Operability Determination will be put in procedure AP 22D-001, "Refueling Outage Planning and Implementation."	December 15, 2008

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 Entry into Mode 4 without an operable containment spray system
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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
05	07	2008	2008	- 006 -	00	07	03	2008		05000
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE 4	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 000	<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 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 checked="" 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 Richard D Flannigan, Manager Regulatory Affairs								TELEPHONE NUMBER (Include Area Code) (620) 364-4117	

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REORT									
CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX
A	BE	P	I075	No					

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

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

During Refueling Outage 16, Wolf Creek Generating Station entered Mode 4 on 05/07/08 at 2044 with the "B" containment spray pump inoperable. A post maintenance visual weld examination (VT-2) for leakage had not been completed as required by the In-service Testing Program prior to Mode 4 entry. Technical Specification 3.6.6. Limiting Condition for Operation (LCO) 3.6.6 requires two containment spray trains and two containment cooling trains to be Operable in Modes 1, 2, 3, and 4.

The incomplete VT-2 test was discovered early on 5/8/2008 and an entry into the Technical Specification 3.6.6. LCO was made at 0145 on 5/8/08. The VT-2 examination was successfully performed and the containment spray system was declared operable at 0313 on 5/8/2008.

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
WOLF CREEK GENERATING STATION	05000 482	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		2008	-- 006	-- 00	

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

PLANT CONDITIONS PRIOR TO EVENT:

MODE – 4
Power – 000

EVENT DESCRIPTION:

The NRC issued a requirement to perform full flow testing (design flow verification) via 10 CFR 50.55a for all pumps listed under the In-service Testing (IST) program in 2005. A Design Change Package was developed to enable full flow testing of the containment spray pumps [EIS Code: BE-P] without the adverse consequences of spraying down containment. The modification would install a new recirculation flow path line to enable full flow testing of the containment spray pumps.

The modification was originally scheduled for Refueling Outage (RF)15 and a Mode 4 restraint Work Order was created to implement the modification. Sub Work Orders (SWO) were initiated for the containment spray modification to have Quality Control (QC) perform a VT-2 examination of the bypass lines installed on trains "A" and "B". The Shutdown Mode Code for the "A" train SWO was incorrectly changed from Mode 4 Hot Shutdown, to Mode 7 No Restraint. The "B" train SWO was then copied from the "A" train SWO also with a Mode 7 No Restraint.

A one-time Relief Request was submitted to the NRC to postpone the containment spray modification until RF 16. The NRC approved the relief request and the containment spray modification was then removed from the RF15 scope and moved into the developing RF16 schedule.

During the modification work in RF 16, the VT-2 examinations were correctly accounted for in the outage schedule. Issues with the alignment on flanges in the containment spray system occurred. The "A" train flange alignment issues were worked according to the outage schedule. The VT-2 test was completed satisfactorily.

On the "B" train, the decision was made to machine spacer rings to compensate for the misalignments. The refueling outage schedule was changed to support the completion of the spacer ring work prior to the plant entering Mode 4. The VT-2 examination was inadvertently dropped from the schedule when this occurred. Since the SWO for the VT-2 examination was a Mode 7 restraint, it was not accounted for during the Mode 4 Work Order Review or on the Mode 4 checklist.

The plant entered Mode 4, at 1844 on 05/07/08. The missed examination was discovered early on 05/08/08 when the nightshift IST Coordinator and QC were reviewing the remaining open work requests. Operations was notified and entry into Technical Specification 3.6.6. Limiting Condition for Operation (LCO) 3.6.6, which requires two containment spray trains and two containment cooling trains to be Operable in Modes 1 through 4, was made at 0145 on 5/8/08. The VT-2 examination was scheduled and successfully performed by QC. The "B" train containment spray system was declared operable at 0313 on 5/8/08.

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		2008	-- 006	-- 00	

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

BASIS FOR REPORTABILITY:

The plant entered Mode 4 without confirming that the containment spray system was operable. This is reportable per 10CFR50.73(a)(2)(i)(B) for any operation or condition which was prohibited by the plant's Technical Specifications.

ROOT CAUSE:

The Sub Work Order was miscoded as a Mode 7 restraint instead of a Mode 4 restraint. The miscoding led to the missed operability determination when the 'B' train containment spray system was returned to service.

CORRECTIVE ACTIONS:

A method for reviewing Open Work Orders against Technical Specification related systems before making an Operability Determination will be developed. This action shall be incorporated in procedure AP 22D-001, "Refueling Outage Planning and Implementation," by 12/15/08.

SAFETY SIGNIFICANCE:

The safety significance of this event was low. Nuclear safety had the potential for being affected if the VT-2 examination had identified any flaws. The successful completion of the surveillance tests confirmed the containment spray system would perform its safety function per the license design basis. There was no affect to plant reliability, personnel safety, radiological safety, or environmental safety.

OPERATING EXPERIENCE/PREVIOUS EVENTS:

None.