

Matthew W. Sunseri Vice President Operations and Plant Manager

October 15, 2009

WO 09-0035

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

Subject:

Docket No. 50-482: LER 2009-003, Post Fire Safe Shutdown Issue During Postulated Control Room Fire

Gentlemen,

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The enclosed Licensee Event Report (LER) 2009-003-00 is being submitted pursuant to 10 CFR 50.73(a)(2)(ii)(B). This is in regard to the time it takes to manually close a valve in response to a control room fire being outside the time assumed in the thermal hydraulic analysis.

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) 364-4008, or Mr. Richard D. Flannigan, Manager Regulatory Affairs at (620) 364-4117.

Sincerely,

MW Ju

Matthew W. Sunseri

MWS/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

Attachment to WO 09-0035 Page 1 of 1

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# List of Regulatory Commitments

The following table identifies those actions committed to by WCNOC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Richard Flannigan at (620) 364-4117.

| Regulatory Commitments   | Due Date   |
|--|------------|
| BNHV8812B was manually stroked on 9/23/2009 and the results recorded. Manually stroking of BNHV8812A is scheduled to occur during the current refueling outage. Based on the times, the thermo-hydraulic analysis will be revised using these more accurate times. | 11/30/2009 |
| Submit supplement to LER 2009-003 based on results of ongoing corrective actions.  | 12/16/2009 |

| NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION                               |  |   |  |  |  | SSION A  | APPROVED BY OMB: NO. 3150-0104 EXPIRES: 08/31/2010  |  |   |   |   |   |   |  |
|---|--|---|--|--|--|--|---|--|---|---|---|---|---|--|
| (See reverse for required number of digits/characters for each block)         |  |   |  |  |  |  | Extincted burden per response to comply with this mandatory collection request: 80 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 intermet 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.  |  |   |   |   |   |   |  |
|   | rating   | Station   |  |  |  | 2.   |   |  |   | 3.  |   | OF 3  |   |  |
| 4. TITLE<br>Post Fire Safe Shutdown Issue during Postulated Control Room Fire |  |   |  |  |  |  |   |  |   |   |   |   |   |  |
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| FACILITY NAME<br>Richard D. Flannigan, Manager Regulatory Affairs             |  |   |  |  |  |  | TELEPHONE NUMBER (Include Area Code)<br>(620) 364-4117  |  |   |   |   |   |   |  |
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I<br>YEAR YEAR<br>2009 2009<br>MODE 1<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>20.2<br>2 | LICENSEE EVENT F<br>(See reverse for requi<br>digits/characters for<br>ME<br>ek Generating Station<br>Safe Shutdown Issue<br>DATE 6. 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THIS REPORT<br>20.2201(b)<br>20.2201(d)<br>20.2203(a)(2)(i)<br>20.2203(a)(2)(i)<br>20.2203(a)(2)(i)<br>20.2203(a)(2)(i)<br>20.2203(a)(2)(i)<br>20.2203(a)(2)(i)<br>20.2203(a)(2)(i)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.2203(a)(2)(v)<br>20.220 | LICENSEE EVENT REPORT (LER)         (See reverse for required number of digits/characters for each block)         ME         ek Generating Station         Safe Shutdown Issue during Postula         DATE       6. LER NUMBER       7. F         YEAR       YEAR       SEQUENTIAL       REV NO.       MONTH         2009       2009       - 003       - 00       10         MODE       11. THIS REPORT IS SUBMIT         20.2201(b)       20.2203(a)(2)(i)       10         D. 20.2203(a)(2)(i)         20.2203(a)(2)(i)         20.2203(a)(2)(i)         20.2203(a)(2)(ii)         20.2203(a)(2)(ii) | LICENSEE EVENT REPORT (LER)         (See reverse for required number of digits/characters for each block)         ME         Safe Shutdown Issue during Postulated Cor         DATE         O LER NUMBER         YEAR         SEQUENTIAL REV MONTH DAY         2009         OD 10         15         UMMBER         OD 10         10         YEAR         SEQUENTIAL REV MONTH DAY         NODE         11. 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Safe Shutdown Issue during Postulated Control Romonates of number of number of number of sequence of the sequence of th</td><td>LICENSEE EVENT REPORT (LER)         Estimated request: 40 licensing prediction of digits/characters for each block)         NME         Colspan="2"&gt;Colspan="2"&gt;Colspan="2"&gt;Colspan="2"&gt;Colspan="2"&gt;Colspan="2"&gt;Colspan="2"&gt;Estimated request: 40 licensing prediction of digits/characters for each block)         NME         Colspan="2"&gt;Colspan="2"Colspan="2</td><td>Estimated burden perequest: 80 hours.         Estimated burden perequest: 80 hours.         LICENSEE EVENT REPORT (LER)         (See reverse for required number of digits/characters for each block)         Nuclear Regulatory C emails to infocollection does not tig.         ME         COCKET NUMBER         Cock ET NUMBER         OD CKET NUMBER         VEROR TO TO TE         Seaden TitAL         YEAR         YEAR         YEAR         SEQUENTIAL REV MONTH DAY YEAR         APPORT TO THE REQUIREM         OD TE         A YEAR         SEQUENTIAL REV MONTH DAY YEAR         YEAR YEAR SEQUENTIAL REV MONTH DAY YEAR         A YEAR SEQUENTIAL REV MONTH DAY YEAR         A YEAR SEQUENTIAL REV MONTH DAY YEAR         A YEAR SEQUENTIAL</td><td>Estimated burden per response<br/>request: 80 hours: Reported<br/>lising process and let back to<br/>Nuclear Regulatory Affairs, NEOB-10<br/>Mudear Regulatory Affairs, NEOB-10<br/>Mudear Meaning Station         LICENSEE EVENT REPORT (LER)         (See reverse for required number of<br/>digits/characters for each block)         ME<br/>ex Generating Station         DATE         Safe Shutdown Issue during Postulated Control Room Fire         DATE         VERN VEAR         YEAR         YEAR</td><td>LICENSEE EVENT REPORT (LER)       Estimated burden per response to c<br/>request. 80 hours. Reported lesson<br/>derivation of the second and PC/WP<br/>Nuclear Regulatory Commission, Weat<br/>end to Infocust@mr.gov, and to<br/>and Regulatory Affairs. NC-01022. (<br/>Budget, Washington, DC 2000). If a<br/>not conduct or sponsor, and a perse<br/>information collection.         MME<br/>exk Generating Station       2. DOCKET NUMBER<br/>0.5000 482         Safe Shutdown Issue during Postulated Control Room Fire<br/>05000 482       3. OTHER FACI<br/>05000 482         Safe Shutdown Issue during Postulated Control Room Fire<br/>02009 2009 - 003 - 00       10         MODE       11. 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NRC FORM 366A (9-2007) LICENSEE EVENT REPORT (LER)<sup>U.S. NUCLEAR REGULATORY COMMISSION</sup> CONTINUATION SHEET

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|-------------------------------|-----------|------|----------------------|------------|---------|------|--|--|
| 1. FACILITY NAME              | 2. DOCKET |      | 6. LER NUMBER        |            | 3. PAGE |      |  |  |
| Wolf Creek Generating Station | 05000     | YEAR | SEQUENTIAL<br>NUMBER | REV<br>NO. |         |      |  |  |
|                               | 05000 482 | 2009 | - 003 -              | 00         | 2       | OF 3 |  |  |

#### NARRATIVE

#### BACKGROUND:

BNHV8812A, RWST to RHR "A" pump suction isolation valve, is normally open and is manually closed in OFN RP-017, "Control Room Evacuation," to prevent the RWST from draining to the containment sump in the event that EJHV8811A, containment recirculation sump to RHR "A" pump suction isolation valve, spuriously opens.

PLANT CONDITIONS PRIOR TO EVENT:

MODE - 1 Power - 100% Normal Operating Temperature and Pressure

#### EVENT DESCRIPTION:

BNHV8812A, the "A" Residual Heat Removal (RHR) pump suction from the Refueling Water Storage Tank (RWST), is manually closed in off normal operations procedure OFN RP-017, "Control Room Evacuation," in response to a Control Room fire. The valve was never closed to establish the baseline time. During a simulated timing of BNHV8812A, it was always assumed that it took approximately one minute to close the valve.

During discussion with the motor operated valve (MOV) engineer it was revealed that valve BNHV8812A has been calculated to take 600 turns to close. An Operations Standing Order limits the number of handwheel turns to 60 turns per minute. A Safety Bulletin on Limitorque Actuators was issued on June 2004, as a result of a valve operator catastrophic failure that resulted in a fatality at Crystal River fossil plant. This Safety Bulletin limits the number of handwheel turns to 60 turns per minute. At a closure rate of 60 turns per minute, it would take a minimum of 10 minutes to close the valve, rather than the assumed one minute. The additional nine minutes necessary to close the valve will delay the completion of subsequent steps in procedure OFN RP-017. Most significantly, the time to establish charging flow increases from 20 minutes to a minimum of 29 minutes. Thermal hydraulic analysis assumes charging flow will be established within 28 minutes. Therefore, the time to establish charging flow exceeds that assumed in the thermal hydraulic analysis by at least one minute.

This issue was found to be a historical issue. Since procedure OFN RP-017 was first implemented, it had always been assumed that all valves could be manually closed within one minute. Manually closing and timing BNHV8812A was never performed.

Only one other MOV was found that would take more than one minute to manually operate locally, however that valve is expected to be in its required position. If it must be manually operated, it is estimated to take two and one half minutes to place in the correct position. This would not adversely impact the safety analysis.

#### BASIS FOR REPORTABILITY:

This condition, Event Notification 45277, is 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. Additionally, WCNOC made an eight hour Emergency Notification System call in accordance with 10 CFR 50.72(b)(3)(ii)(B).

#### CAUSE:

The cause of this issue is historical in nature. An invalid assumption was made that all the valves could be manually closed in one minute.

### CORRECTIVE ACTIONS:

Procedure OFN RP-017 was revised. Attachment E of the procedure, "BN HV-8812A Closure", was created with the sole purpose of closing BNHV8812A. This separated it from the sequence of actions that align charging flow. The additional operator performing Attachment E will ensure response time meets the required limits.

| NRC FORM 366A<br>(9-2007) LICENSEE EVENT REPORT (LER) <sup>U.S. NUCLEAR REGULATORY COMMISSION</sup><br>CONTINUATION SHEET |           |               |         |  |  |  |  |
|---|-----------|---------------|---------|--|--|--|--|
| 1. FACILITY NAME  | 2. DOCKET | 6. LER NUMBER | 3. PAGE |  |  |  |  |
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| Wolf Creek Generating Station | <b>05000</b> 482 | YEAR | SEQUENTIAL<br>NUMBER | REV<br>NO. | 3 OF | 3 |  |
|                               | 00000 482        | 2009 | <b>-</b> 003 ·       | - 00       | 3 01 |   |  |

### NARRATIVE

# CORRECTIVE ACTIONS:

Additional actions have not been fully completed. BNHV8812B was manually stroked on 9/23/2009 and the time was recorded. Manually stroking of BNHV8812A is scheduled to occur during the current refueling outage. Based on the times, the thermo-hydraulic analysis will be updated.

## SAFETY SIGNIFICANCE:

A fire in the Control Room of such magnitude and severity as to cause an evacuation and plant shutdown is extremely unlikely. The combustible loading in the Control Room is low and interior finish materials meet or exceed the surface flammability requirements of applicable standards. The cables entering the control room are IEEE 383 rated. Large concentrations of cables in the control room trenches are protected with an automatic Halon extinguishing system. Additionally, automatic smoke detectors are located in the control cabinets and trenches.

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.

### PREVIOUS OCCURRENCES:

LER 2005-006-00 described a timed walk down for restoring Reactor Coolant Pump seal cooling , for a shutdown outside the Control Room, did not meet the required time.