



Matthew W. Sunseri  
President and Chief Executive Officer

October 18, 2012

WM 12-0039

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

Reference: Letter dated September 21, 2012, from E. E. Collins, USNRC, to  
M. W. Sunseri, WCNOG

Subject: Docket No. 50-482: Reply to Notice of Violation EA-12-152

Gentlemen:

In accordance with 10 CFR 2.201, the attachment provides Wolf Creek Nuclear Operating Corporation's (WCNOG) reply to Notice of Violation (NOV) EA-12-152 as contained in the reference (Inspection Report 05000482/2012010).

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4008, or Mr. Gautam Sen at (620) 364-4175.

Sincerely,

A handwritten signature in black ink, appearing to read "M W Sunseri".

Matthew W. Sunseri

MWS/rlt

Attachment

cc: B. J. Benney (NRC), w/a  
E. E. Collins (NRC), w/a  
N. F. O'Keefe (NRC), w/a  
Senior Resident Inspector (NRC), w/a

IEDI  
NRR

## **Reply to Notice of Violation (NOV) EA-12-152**

### **Description of Violation Identified in NOV EA-12-152**

Technical Specification 5.4.1(a), "Procedures," requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Regulatory Guide 1.33, "Quality Assurance Program Requirements," Appendix A, Section 9.a, specifies maintenance that can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Work Order 11-240360-006, Revision 3, required installation of insulation sleeves over each wire splice on current transformer wires in the startup transformer B phase protective relay circuit, as part of the implementation of the external wiring connection procedure.

Contrary to the above, between April 16 and 27, 2011, maintenance that affected safety-related equipment was not implemented in accordance with written procedures. Specifically, the electrical penetration seal and wiring assembly associated with the H1/CT4 and H2/CT5 current transformers installed in the startup transformer B phase protective relay circuit (XMR01) were replaced without insulating two of the splices, as required by Work Order 11-240360-006, Revision 3. On January 13, 2012, the startup transformer experienced a trip and lockout during a plant trip because the two uninsulated wires touched and provided a false high phase differential signal to the protective relaying circuit. The protective lockout caused a prolonged loss of offsite power to all Train B equipment and all non-safety related buses.

### **Reason for the Violation**

Wolf Creek Nuclear Operating Corporation (WCNOC) personnel did not properly assess the risk/consequences of having the original equipment manufacturer perform work on the Startup Transformer. As a result, WCNOC personnel, at all levels, did not implement and enforce the company's accountability model, primarily with respect to procedural use and adherence. WCNOC governing procedures were not used on the Startup Transformer as prescribed for monitoring and supporting the vendor work. This less than adequate implementation missed the opportunity for providing effective oversight and monitoring of the vendor work evolution by WCNOC personnel, and allowed an undetected human performance error.

### **Corrective Steps That Have Been Taken and Results Achieved**

Following identification of the missing insulating sleeves on the Startup Transformer, additional external inspections were performed on the remaining Startup Transformer current transformer junction blocks. No additional wiring workmanship issues were identified on the Startup Transformer. On February 22, 2012, WCNOC repaired the phase 'A' and 'B' insulating sleeves.

Additionally, WCNOG performed equipment hardware testing on the Unit Auxiliary Transformer, the three Main Transformers, and the Main Generator. Additional wiring issues were found on the Main Transformers, which included one installed spiral cut insulating sleeve and multiple broken strands in the crimping area of the butt splice. An evaluation of the broken strands determined no impact to the design function. All deficiencies were repaired and testing verified the repairs were successful.

Procedure AP 24B-001, "Control of Site Contractor Services," was revised in concert with the changes to the work controls process to ensure sufficient controls to address site vendor performance. This action ensures that the WCNOG Representative understands their roles and responsibilities and the appropriate work control verifications and oversight are invoked. Mandatory training was completed on August 29, 2012 for procedure AP 24B-001.

Procedure AI 16C-007, "Work Order Planning," was revised to ensure adequate controls are applied to critical and non-critical assets, regardless of their safety classification. Mandatory training was completed on August 29, 2012 for procedure AI 16C-007.

**Corrective Steps That Will Be Taken to Avoid Future Violation**

All actions to restore compliance have been taken.

**Date When Full Compliance Will Be Achieved**

Full compliance has been achieved.