

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Adam C. Heflin  
President, Chief Executive Officer and Chief Nuclear Officer

March 10, 2016  
WM 16-0006

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

Reference: Letter dated February 11, 2016, from N. H. Taylor, USNRC, to A. C. Heflin, WCNOG

Subject: Docket No. 50-482: Reply to Notice of Violation EA-16-018

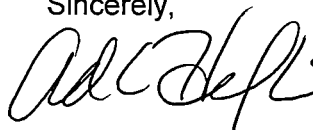
Gentlemen:

In accordance with 10 CFR 2.201, Attachment I provides Wolf Creek Nuclear Operating Corporation's (WCNOG) reply to Notice of Violation (NOV) EA-16-018 as contained in the reference (Inspection Report 05000482/2015004). Attachment II identifies one regulatory commitment made in response to NOV EA-16-018.

The WCNOG Corrective Action Review Board (CARB) has not reviewed the Root Cause Analysis for this violation. The response to this NOV is due March 12, 2016 (30 days following the date of the NOV). Therefore, if after CARB review, there is a need to revise the information provided herein, WCNOG will provide a supplemental response as soon as possible.

If you have any questions concerning this matter, please contact me at (620) 364-4000, or Cynthia R. Hafenstine (620) 364-4204.

Sincerely,



Adam C. Heflin

ACH/rlt

Attachment I: Reply to Notice of Violation (NOV) EA-16-018  
Attachment II: List of Regulatory Commitments

cc: M. L. Dapas (NRC), w/a  
C. F. Lyon (NRC), w/a  
N. H. Taylor (NRC), w/a  
Senior Resident Inspector (NRC), w/a

IEDI  
NRR

## **Reply to Notice of Violation (NOV) EA-16-018**

### **Description of Violation Identified in NOV EA-16-018**

Title 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, in the case of significant conditions adverse to quality, that measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, from October 18, 2013, to May 16, 2015, the licensee failed, in the case of a significant condition adverse to quality, to assure that the cause of the condition was determined and corrective action taken to preclude repetition. Specifically, the licensee did not establish adequate measures to assure that the cause of train A Class 1E electrical equipment air-conditioning system (SGK05A) unit trips that occurred on October 18, 2013, was determined and corrective action taken to preclude repetition of the SGK05A unit trips. The condition recurred twice on May 15, 2015. This violation was previously identified by the Nuclear Regulatory Commission (NRC) as non-cited violation 05000482/2013005-04, after which the licensee failed to restore compliance.

### **Reason for the Violation**

Wolf Creek Nuclear Operating Corporation (WCNOC) did not take corrective action to correct contamination found within the SGK05A compressor, by replacement of the compressor, in a reasonable period of time.

WCNOC leadership did not properly allocate personnel to the design change for the SGK05A compressor replacement, did not communicate the design change status effectively, and failed to realize that progress was not adequate to ensure successful completion in Refueling Outage 20 (RF20). As a result, measures to correct SGK05A issues were inadequate and a repetitive failure occurred.

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

Corrective steps that have been taken and results achieved to ensure successful completion of the replacement of the SGK05A compressor:

1. The new compressor has been purchased and delivered to Wolf Creek Generating Station (WCGS).
2. Engineering resources were obtained to assist with preparation of the Design Change Package (DCP) for the SGK05A compressor replacement. DCP 014566, SGK05A&B PMT-Bitzer Compressor Replacement, Rev 0, has been issued.
  - The compressor design has a new type of oil that is less susceptible to moisture intrusion.
  - The compressor design has a new type of lube oil pressure switch. The new switch is not a flow-through design like the current switch that is susceptible to debris loading. This change addresses the direct cause of the October 18, 2013

and May 15, 2015 events; residual contaminants entrained within the compressor sump migrated to the lube oil sensor inlet screen resulting in a false low lube oil signal.

- The DCP includes installation of a replacement suction accumulator. This change addresses a contributing cause to one of the events that led to the NRC non-cited violation 05000482/2013005-04.
3. A maintenance window is currently scheduled in October 2016, during Refueling Outage 21 (RF21), to perform the compressor replacement on SGK05A.
  4. The work orders for the compressor replacement are being planned for field work to occur in RF21. The work scope includes replacement and inspection of other components on the SGK05A unit and the planned scope has incorporated the WCGS internal operating experience from prior SGK05A events.
  5. Bi-weekly meetings are being conducted by Maintenance to review any issues with readiness for the compressor replacement and prioritize the issues and assign actions.

#### **Corrective Steps That Will Be Taken**

WCNOC will complete installation of the replacement compressor on the SGK05A Class 1E electrical equipment air-conditioning unit. This action will be completed prior to plant start-up from RF21, which is currently scheduled to start on September 24, 2016.

#### **Date When Full Compliance Will Be Achieved**

Full compliance will be achieved when the installation of the SGK05A replacement compressor is complete. This will be completed prior to plant start-up following RF21.

## LIST OF REGULATORY COMMITMENTS

The following table identifies a commitment made 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 this commitment to Cynthia Hafenstine, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4204.

REGULATORY COMMITMENT	DUE DATE
WCNOC will complete installation of the replacement compressor on the SGK05A Class 1E electrical equipment air-conditioning unit.	Prior to plant start-up from Refueling Outage 21.