



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

November 14, 2018

Mr. Adam C. Heflin, President  
and Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
P.O. Box 411  
Burlington, KS 66839

SUBJECT: WOLF CREEK GENERATING STATION NRC DESIGN BASES ASSURANCE  
(TEAMS) INSPECTION REPORT 05000482/2018010

Dear Mr. Heflin:

On August 3, 2018, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Wolf Creek Generating Station. On August 2, 2018, the NRC team held an initial debrief of the results of this inspection with Mr. Jamie McCoy, Site Vice President, and other members of your staff. On October 1, 2018, a phone call was held with Mr. Steve Smith, Vice President, Engineering, and other members of the licensee staff, to clarify the characterization of the identified findings. On November 1, 2018, an additional phone call was held with Mr. Daljit Mand, Director, Engineering, and other members of the licensee staff, to revise the characterization of the identified findings. On November 13, 2018, a final exit phone call was held with Mr. Gabe Fugate, Director, Plant Support, and other members of the licensee staff, to identify changes to the inspection findings as a result of an enforcement policy review. The results of this inspection are documented in the enclosed report.

The NRC team documented four findings of very low safety significance (Green) and one licensee identified finding, in this report. These findings involved violations of NRC requirements. The NRC is treating these violations as non-cited violations (NCVs) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violations or significance of these NCVs, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement; and the NRC resident inspectors at the Wolf Creek Generating Station.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document

Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

*/RA/*

Thomas R. Farnholtz, Chief  
Engineering Branch 1  
Division of Reactor Safety Sincerely,

Docket No. 50-482  
License No. NPF-42

Enclosure:  
Inspection Report 05000482/2018010  
w/ Attachment:  
Supplemental Information

**U.S. NUCLEAR REGULATORY COMMISSION  
Inspection Report**

Docket Number: 05000482

License Number: NPF-42

Report Number: 05000482/2018010

Enterprise Identifier: I-2018-010-0041

Licensee: Wolf Creek Nuclear Operating Corporation

Facility: Wolf Creek Generating Station

Location: Burlington, KS 66839

Inspection Dates: July 11, 2018 to August 3, 2018

Inspectors: R. Kopriva, Senior Resident Inspector, Engineering Branch 1  
F. Thomas, Resident Inspector, Branch B  
I. Anchondo, Reactor Inspector, Engineering Branch 2  
A. Palmer, Senior Reactor Technology Instructor, Technical Training  
Center  
H. Leake, Contractor, Beckman and Associates  
J. Zudans, Contractor, Beckman and Associates

Approved By: Thomas R. Farnholtz, Chief  
Engineering Branch 1  
Division of Reactor Safety

## SUMMARY

The Nuclear Regulatory Commission (NRC) continued monitoring the licensee’s performance by conducting an Integrated Inspection at Wolf Creek Generating Station in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC’s program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information. NRC-identified and self-revealed findings, violations, and additional items are summarized in the table below.

### List of Findings and Violations

| Failure to Follow Procedures   |  |                      |                |
|--|--|----------------------|----------------|
| Cornerstone  | Significance                               | Cross-cutting Aspect | Report Section |
| Mitigating Systems   | Green<br>NCV 05000482/2018010-01<br>Closed | None                 | 71111.21M      |
| The team identified two examples of a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for failure to follow procedures. |  |                      |                |

| Failure to Establish an Adequate Procedure for Operator Time Critical/Time Sensitive Actions Validation  |  |                      |                |
|--|--|----------------------|----------------|
| Cornerstone  | Significance                               | Cross-cutting Aspect | Report Section |
| Mitigating Systems   | Green<br>NCV 05000482/2018010-02<br>Closed | None                 | 71111.21M      |
| The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for failure to have an adequate Procedure. Procedure AI 21-016, “Operator Time Critical Actions Validation,” Revision 14, Attachment B – “Time Sensitive Action List,” does not have unique identifiers for cross referencing the records to the procedure. |  |                      |                |

| Failure to Correct Reoccurring Problems with Time Critical/Sensitive Action Activities  |  |   |                |
|---|--|---|----------------|
| Cornerstone   | Significance                               | Cross-cutting Aspect                                    | Report Section |
| Mitigating Systems  | Green<br>NCV 05000482/2018010-03<br>Closed | [P.4] – Problem Identification and Resolution, Trending | 71111.21M      |
| The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, “Corrective Action,” for the licensee’s failure to correct reoccurring problems with Time Critical/Time Sensitive Action issues. |  |   |                |

| Failure to Identify that the 125 VDC Equalizing Voltage had Exceeded Design Requirements   |  |  |                |
|--|--|--|----------------|
| Cornerstone  | Significance                               | Cross-cutting Aspect                           | Report Section |
| Mitigating Systems   | Green<br>NCV 05000482/2018010-04<br>Closed | [H.13] – Human Performance, Consistent Process | 71111.21M -    |
| <p>The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” for the failure to verify or check the adequacy of design calculation NK-E-001, “125 Volt Direct-Current (VDC) Class 1E Battery System Sizing, Voltage Drop and Short Circuit Studies,” Revision 4. The licensee failed to recognize that the actual 125 VDC Class 1E bus voltages had exceeded the maximum design limit voltages for downstream equipment identified in the calculation, and they had not placed any limits on voltages which could exceed the design limit of 140 VDC on the Class 1E System components.</p> |  |  |                |

## INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

## REACTOR SAFETY

### 71111.21M—Design Bases Assurance Inspection (Teams)

From July 16, 2018 to August 3, 2018, the team reviewed the following design attributes associated with risk-significant components, permanent plant modifications, and operating experience.

#### Component (6 Samples)

- (1) Turbine Driven Auxiliary Feedwater Pump PAL02.
  - a) Material condition of pump/turbine and pump room walkdown.
  - b) Condition reports and maintenance activities associated with pump and turbine.
  - c) Operating procedures for pump operation during a design bases loss-of-coolant accident coincident with a loss-of-offsite power.
  - d) Pump testing procedures and test trends associated with in-service testing.
  - e) System health, system descriptions, vendor technical manual and corrective action reviews.
  - f) Engineering evaluations of pump non-conforming conditions.
- (2) Shutdown RCP Seals.
  - a) Material condition of seals, maintenance activities and corrective actions.
  - b) Operating procedures for pump operation in support of FLEX conditions and conformance to requirements for sealing acceptability.
  - c) Condition reports and maintenance activities associated with seals and seal package.
  - d) FLEX strategies and their implementation at Wolf Creek and conformance to regulatory requirements.
  - e) Reactor coolant pump seal test procedures, test results and test trends.
  - f) Evolution of Generation III design and modification changes.
- (3) Reactor Coolant Pump A Circuit Breaker PA0107.
  - a) Design Basis documents.
  - b) Current system health report.
  - c) Selected drawings.
  - d) Maintenance and test procedures.
  - e) Condition Reports associated with the Reactor Coolant Pump Circuit

- Breaker PA0107.
  - f) Component maintenance history and corrective action program reports.
  - g) Electrical distribution and system load flow/voltage drop calculations.
- (4) 125 VDC Switchboard Bus NK41
- a) Design basis documents.
  - b) Current system health report.
  - c) Selected drawings.
  - d) Maintenance and test procedures.
  - e) Condition Reports associated with the 125 Volts Direct Current (VDC) System Inverter Bus NK01.
  - f) Battery short circuit calculations, sizing calculations, coordination studies, voltage drop calculations, and switchboard maintenance activities were appropriate for the design of the system.
  - g) Input and output operating voltage characteristics to verify the NK41 switchboard and downstream components can perform their design function through all input voltage ranges.
  - h) Component maintenance history and corrective action program reports.
  - i) Preventive maintenance, inspection, and testing procedures for Class 1E 125 VDC System components.
- (5) 13.8KV AC Bus PA01
- a) Component maintenance history and corrective action program reports.
  - b) Load flow, voltage drop, and short circuit calculations.
  - c) Protective device selection and settings.
  - d) Procedures for preventive maintenance, inspection, and testing.
  - e) Material condition and configuration (i.e., visual inspection during a walkdown).
- (6) 4160 VAC Bus NB02
- a) Component maintenance history and corrective action program reports.
  - b) Load flow, voltage drop, and short circuit calculations.
  - c) Protective device selection and settings.
  - d) Procedures for preventive maintenance, inspection, and testing.
  - e) Equipment qualification specifications.
  - f) Adequacy of offsite power during design basis events.
  - g) Material condition and configuration (i.e., visual inspection during a walkdown).

Component Large Early Release Frequency (LERF) (1 Sample)

- (1) Containment Isolation Valve EJHV8701A
- a) Procedures and associated testing records for the containment and pressure isolation function.
  - b) Operating procedures for manual manipulation of EJHV8701A during accident conditions.
  - c) Component maintenance history and corrective action program reports.

Permanent Plant Modification (4 Samples)

- (1) DCP 014893, "Switchgear Racking Mechanism Chain Repair,"
- (2) DCP 015251, "Emergency Diesel Generator Exciter Power Potential Transformer Protection,"

- (3) DCP 015214, "Essential Service Water - Water Hammer Vacuum Breaker Valves Spring Replacement,"
- (4) DCP 015040, "Nitrogen Backup for EJHCV0606 and EJHCV0607,"
- (5) DCP 014831, "Improved Reactor Coolant Pump Passive Shutdown Seal."
- (6) DCP 004637, "Residual Heat Removal Heat Exchanger Outlet Valve Nitrogen Backup Port."
- (7) DCP 015081, "New Residual Heat Removal Pressure Transmitter EJPIT0027 and NPIS Point."

#### Operating Experience (1 Sample)

- (1) NRC Generic Letter 2006-02, "Grid Reliability and the Impact on Plant Risk and the Operability of Offsite Power"

#### Evaluation of Inspection Related Operator Procedures and Actions

- (1) Control room operator actions resulting from a simulated small break Loss of Coolant Accident.
  - a) Control room crew was expected to implement procedures to address the loss of coolant accident and trip reactor coolant pumps when conditions were met.
  - b) From the time when reactor coolant system pressure drops below setpoint and conditions are met the operators must take actions to secure reactor coolant pumps within five minutes.
- (2) Control room operator actions resulted from a loss of coolant accident which emptied the reactor water storage tank water into containment sump.
  - a) Control room crew was expected to implement procedures to address the empty reactor water storage tank and transfer the emergency core cooling system pumps from injection mode to cold leg recirculation mode.
  - b) From the time the reactor water storage tank level reaches Lo Lo 1 setpoint the operators must take actions to transfer emergency core cooling system equipment from injection mode to cold leg recirculation within eight minutes nine seconds.
- (3) Control room operator actions resulted from a loss of coolant accident which emptied the reactor water storage tank water into containment sump.
  - a) Control room crew was expected to implement procedures to address the empty reactor water storage tank and transfer the remaining emergency core cooling system pumps from injection mode to cold leg recirculation mode.
  - b) From the time the reactor water storage tanks level reaches Lo Lo 2 setpoint the operators must take actions to transfer remaining emergency core cooling system equipment from injection mode to cold leg recirculation within two minutes ten seconds.
- (4) Control room operator actions resulted from a loss of component cooling water in one train with the emergency core cooling system pumps running.
  - a) Control room crew was expected to implement procedures to address stopping the affected emergency core cooling system pumps during a loss of component cooling water cooling in a single train.
  - b) From the time the component cooling water pumps are not running in a single train the operators must take actions to stop the affected emergency core cooling system pumps to prevent damage from loss of cooling within thirty minutes.

All operator action timings were completed on the simulator successfully.

## INSPECTION RESULTS

| Failure to Follow Procedures   |  |                      |                |
|--|--|----------------------|----------------|
| Cornerstone  | Significance                               | Cross-cutting Aspect | Report Section |
| Mitigating Systems   | Green<br>NCV 05000482/2018010-01<br>Closed | None                 | 71111.21M      |
| <p><u>Introduction:</u></p> <p>The team identified two examples of a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for failure to follow procedures.</p>  |  |                      |                |
| <p><u>Example 1</u></p> <p><u>Description:</u></p> <p>The team reviewed control room time critical and time sensitive activities which are used to validate design bases criteria. Without verification and validation of time critical/sensitive activities, the licensee would not be able to confirm that timing of design bases criteria would be met.</p> <p>The team selected time critical and time sensitive, non-exempt tasks to be reviewed, which are identified in Attachments A and B of Procedure AI 21-016, "Operator Time Critical Actions Validation," revision 14. These nonexempt tasks are required to be validated at least once every five years. The team reviewed approximately forty nine records from 2013 to 2018, and found that when reviewing "Time Verification" Form AIF 21-016-02, Revision 1, most of the records provided had Block 2 and Block 3 filled out improperly. The errors included the blocks being empty or were filled out with insufficient information. Block 2 is the identification information to link the form back to the task in the Attachments A or B of the procedure. Block 3 is the reference information to show to how it was validated using other documents. Without correct information in Block 2, the licensee had difficulty demonstrating which task was validated. Without correct information in Block 3, the licensee had difficulty demonstrating under what conditions the task was validated, which calls into question the validity of the document. With some records left blank in Block 2 or Block 3 the licensee was left to determine how the task was validated using comments or assumptions. The team chose only nonexempt tasks to simplify the inspection. It was not clear from the records provided to the team that the licensee's program is being performed as required, and was not being performed as designated in the program procedures.</p> <p>Corrective Actions: The licensee has acknowledged that the forms had not been filled out properly and that Procedure AI 21-016 had not been followed. The licensee has entered this concern into their corrective action program, and will review the concern of failure to follow station procedures.</p> <p>Corrective Action Reference: Condition Report CR-00125356.</p> |  |                      |                |

## Example 2

### Description:

During a review of Operability Evaluation OE-NK-18-005, dated July 26, 2018, the team questioned whether the downstream components from Class 1E 125 VAC Bus NK01 had been considered in the extent of condition of the evaluation. The operability evaluation did not address the downstream components, as Condition Report CR-00125361 only focused on the NK batteries and chargers, without regard for the downstream components. This does not comply with the licensee's procedure AP 26C-004, "Operability Determination and Functionality Assessment," Revision 35. Section 6.1.2.1.a requires that operability determinations should include which structures, systems, and components (SSCs) are affected by the degraded or non-conforming condition. The operability determination performed for condition report CR-125361 failed to meet this requirement in that the components downstream of the NK buses had not been considered for overvoltage effects.

Corrective Actions: On August 1, 2018, the licensee completed the revised Operability Evaluation OE NK-18-005, to address the effect of the overvoltage condition on the downstream 125 VDC rated equipment. The licensee determined that reasonable assurance exists that the systems, structures, and components, associated with the operability evaluation remained capable of performing their specified safety function. The licensee has entered this concern into their corrective action program, and will review the concern of failure to follow station procedures.

Corrective Action Reference: Condition Report CR-00125487

### Performance Assessment:

Performance Deficiency: The team determined that the licensee's failure to follow procedures (Procedure AI-21-016, "Operator Time Critical Actions Validation," Revision 14, and Procedure AP 26C-004, "Operability Determination and Functionality Assessment," Revision 35) was a performance deficiency.

Screening: The team determined the performance deficiency was more than minor because if left uncorrected, the performance deficiency would have the potential to lead to a more significant safety concern. Specifically, for Example 1: the licensee failed to complete Time Verification Form AIF 21-016-02, to accurately validate simulator time critical and time sensitive activities for control room and in plant activities. Without verification of time critical/sensitive activities, the licensee could not confirm the timing of design bases criteria would be met. For Example 2: the operability screening of Condition Report CR-00125361 for the 140 VDC design limit for 125 VDC System components having been exceeded only focused on battery banks NK11, NK12, NK13, NK14, and the battery chargers, but did not address the effects of overvoltage conditions on downstream equipment.

Significance: The team assessed the significance of the findings using NRC Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," issued October 7, 2016. Using Exhibit 2, "Mitigating Systems Screening Questions," the team determined the findings to be of very low safety significance (Green) because the findings were a design or qualification deficiency that did not represent a loss of

operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non-technical specification equipment; and did not screen as potentially risk significant due to seismic, flooding, or severe weather.

Cross-cutting Aspect: The team determined that the finding did not have a cross cutting aspect associated with it.

Enforcement:

Violation: Title 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” which states “Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.”

Contrary to the above, prior to July 30, 2018, the licensee failed to accomplish activities affecting quality in accordance with station procedures. For Example 1; Procedure AI-21-016, “Operator Time Critical Actions Validation,” Revision 14, contains Form AIF 21-016-02, “Time Verification Form,” Revision 1. On AIF 21-016-02, Block 2 is the identification information to link the form back to the task in the Attachments A or B of the procedure. Block 3 is the reference information to show to how it was validated using other documents. On several the forms, Block 2 and Block 3 were not filled out correctly as required by the procedure. For Example 2; licensee Procedure AP 26C-004, “Operability Determination and Functionality Assessment,” Revision 35, Section 6.1.2, states, in part, “that the scope of a Operability Determination must be sufficient to address the capability of systems, structures, and components to perform their specified safety functions.” The operability screening of Condition Report CR-00125361 did not follow Procedure AP 26C-004, in that it did not address all of the capabilities of the component to perform its safety function as the effects of overvoltage conditions on downstream equipment were not analyzed.

Disposition: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

| Failure to Establish an Adequate Procedure for Operator Time Critical Actions Validation |  |                      |                |
|--|--|----------------------|----------------|
| Cornerstone  | Significance                               | Cross-cutting Aspect | Report Section |
| Mitigating Systems   | Green<br>NCV 05000482/2018010-02<br>Closed | None                 | 71111.21M      |

Introduction:

The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for failure to have an adequate Procedure. Procedure AI 21-016, “Operator Time Critical Actions Validation,” Revision 14, Attachment B – “Time Sensitive Action List,” does not have unique identifiers for cross referencing the records to the procedure.

Description:

The Design Basis Assurance inspection procedure 71111.21M, Section 03.01 b.2.b discusses operations margin and refers to components required to be operated during high risk and/or time critical operations. The team elected to review Procedure AI 21-016, "Operator Time Critical Actions Validation," Revision 14, to confirm that the licensee was performing design basis time critical and time sensitive actions for operations activities. The team identified a procedure deficiency in that Attachment B, "Time Sensitive Action List," did not have unique identifiers in task Block 2 similar to task Block 2 found in Attachment A. This lack of unique identifier prevents cross referencing the records for Time Sensitive Actions listed in Attachment B with the records documenting the required validation. Block 2 of Form AIF AI 21-016-02 would use this information to link the form back to the task in the procedure attachments to prove it had been validated.

As an example, in the Time Critical Action heading, each time critical action in Attachment A starts with a code "TCA\_SLB\_S1". Attachment B just has verbiage. The records that were provided were filled out with a variety of descriptions, usually not matching the description provided in the attachment. Without this unique information identifier, it was difficult to determine which task was validated, and at times impossible to determine what was being validated.

Corrective Actions: The licensee has acknowledged that Form AIF AI 21-016-02, Attachment B, "Time Sensitive Action List," did not have unique identifiers in task Block 2, and is in the process of reviewing the procedure to identify and correct deficiencies that may exist.

Corrective Action Reference: Condition Reports CR-00125536 and CR-00125350.

#### Performance Assessment:

Performance Deficiency: The team determined that the licensee's failure to have an adequate procedure with unique identifiers for the Time Sensitive Actions in Attachment B of Procedure AI 21-016 was a performance deficiency.

Screening: The team determined that the finding was more than minor because it was associated with the Procedure Quality attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the licensee failed to have unique identifiers for the time sensitive actions so that records could be cross referenced to the procedure to document that the required tasks had been validated successfully.

Significance: The team assessed the significance of the finding using NRC Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," issued October 7, 2016. Using Exhibit 2, "Mitigating Systems Screening Questions," the team determined the finding to be of very low safety significance (Green) because the finding was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non-technical specification equipment; and did not screen as potentially risk significant due to seismic, flooding, or severe weather.

Cross-cutting Aspect: The team determined that this finding did not have a cross cutting aspect associated with it.

Enforcement:

Violation: Title 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," which states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above, prior to July 30, 2018, the licensee failed to include appropriate quantitative or qualitative acceptance criteria for determining that important activities had been satisfactorily accomplished. The licensee had failed to establish an adequate procedure for cross referencing Time Sensitive Actions listed in Attachment B with the records documenting the required validation. Specifically, Procedure AI 21-016, Attachment B – "Time Sensitive Action List," Revision 14, was inadequate in that each Time Sensitive Action did not have a unique identifier for cross referencing the records to the procedure. (Could not correlate which records were used to validate which task).

Disposition: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

| Failure to Correct Reoccurring Problems with Time Critical/Sensitive Action Activities |  |   |                |
|--|--|---|----------------|
| Cornerstone  | Significance                               | Cross-cutting Aspect                                    | Report Section |
| Mitigating Systems   | Green<br>NCV 05000482/2018010-03<br>Closed | [P.4] – Problem Identification and Resolution, Trending | 71111.21M      |

Introduction:

The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," for the licensee's failure to correct reoccurring problems with completing Time Critical/Time Sensitive Action issues.

Description:

The team reviewed corrective actions associated with Procedure AP 21-04, "Operator Response Time Program," Revision 4B, and Procedure AI 21-016, "Operator Time Critical Actions Validation," Revision 14. The team found that during the five year cycle of the program, the licensee had identified multiple (approximately 18) deficiencies in the program (i.e. source document to the form is not consistently being utilized, several of the time critical actions in AI 21-016 have not been validated, time critical actions not submitted as required, time sensitive action program requires enhancement, operations time sensitive action cannot be satisfied, several operator time critical actions are not validated and could result in operating outside of analyzed limits.) The licensee's review pertaining to the identification of

the problems, and resolution of the issues had resulted in inadequate identification of reoccurring problems, and problem resolution. The concerns were also identification in a Mid Cycle Self-Assessment (CR-00085924), QA Audits (CR-00104699), and an NRC Component Design Basis Inspection (CR-00103698). The corrective actions derived to answer the concerns had not prevented the problems from reoccurring. The licensee had addressed the concerns in eighteen different condition reports dating back to 2013.

The team found that over the last five years, the corrective actions taken by the licensee for the deficiencies and deviations in the Operator Time Critical Action Validations were ineffective.

Corrective Actions: The licensee has acknowledged that the corrective actions for these issues had not resolved the issues. The licensee has entered this concern into their corrective action program, and will be reviewing the issues.

Corrective Action Reference: Condition Report CR-00125533.

Performance Assessment:

Performance Deficiency: The licensee's failure to promptly identify and correct deficiencies with the validation of Time Critical and Time Sensitive Actions, as required by 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," was a performance deficiency.

Screening: The team determined the performance deficiency was more than minor because if left uncorrected, the performance deficiency would have the potential to lead to a more significant safety concern. Specifically, the licensee did not recognize that they had failed to correct reoccurring deficiencies concerning validation of Time Critical/Time Sensitive Actions over the last five years, which could lead to inaccurate design bases assumptions or incorrect operator actions.

Significance: The team assessed the significance of the finding using NRC Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," issued October 7, 2016. Using Exhibit 2, "Mitigating Systems Screening Questions," the team determined the finding to be of very low safety significance (Green) because the finding was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non-technical specification equipment; and did not screen as potentially risk significant due to seismic, flooding, or severe weather.

Cross-cutting Aspect: The team determined that this finding had a cross cutting aspect in the area of Problem Identification and Resolution, Trending, where the organization periodically analyzes information from the corrective action program and other assessments in the aggregate to identify programmatic and common cause issues. The licensee failed to recognize reoccurring concerns pertaining to time critical action, even after these issues had been identified in self-assessment and Quality Control audits. [P.4]

Enforcement:

Violation: Title 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action", states, in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, defective materials and equipment, and nonconformances, are promptly identified and corrected."

Contrary to the above, since May 2012 until August 1, 2018, the licensee failed to assure that conditions adverse to quality, such as failures, deficiencies, and nonconformances, are promptly identified and corrected. Specifically, the licensee had identified multiple (approximately 18) deficiencies with Time Critical and Time Sensitive Actions and the corrective actions had been inadequate to correct the conditions, even after these issues had been identified in self-assessment and Quality Control audits.

Disposition: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

| Failure to Identify 125 VDC Equalizing Voltage Exceeded Design Requirements   |  |  |                |
|---|--|--|----------------|
| Cornerstone   | Significance                               | Cross-cutting Aspect                           | Report Section |
| Mitigating Systems  | Green<br>NCV 05000482/2018010-04<br>Closed | [H.13] – Human Performance, Consistent Process | 71111.21M -    |
| <u>Introduction:</u>  |  |  |                |
| <p>The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the failure to verify or check the adequacy of design calculation NK-E-001, "125 Volt Direct-Current (VDC) Class 1E Battery System Sizing, Voltage Drop and Short Circuit Studies," Revision 4. The licensee failed to recognize that the actual 125 VDC Class 1E bus voltages had exceeded the maximum design limit voltages for downstream equipment identified in the calculation, and they had not placed any limits on voltages which could exceed the design limit of 140 VDC on the Class 1E System components.</p>  |  |  |                |
| <u>Description:</u>   |  |  |                |
| <p>One of the components the team selected to inspect was the 125 VDC Switchboard Bus NK41. The Wolf Creek Updated Safety Analysis Report, Section 1.2.7.2 states that vital alternating current instrumentation and control power supply systems include battery systems, static inverters, and distribution panels. All of the voltages listed in that section of the updated safety analysis report are nominal values, and all electrical Class IE equipment is designed to accept the expected range in voltage. As part of the review for this component, the team reviewed design calculation NK-E-001, "125 Volt Direct-Current (VDC) Class 1E Battery System Sizing, Voltage Drop and Short Circuit Studies," Revision 4. During the review of the calculation, the team identified concerns with the validation of certain criteria specified in the calculation.</p> <p>The team noted that procedure MPE E050Q-05, "Battery Equalizing Procedure," Revision 14, references a battery equalizing voltage range of 139.5 to 140 VDC for the 125 VDC batteries (NK11, NK12, NK13, and NK14); and procedure STS NB-005, "Breaker Alignment Verification," Revision 34, Appendix B, references a required voltage range of 130 to 140 VDC for the Class 1E 125 VDC electrical distribution buses NK01, NK02, NK03, and NK04.</p> |  |  |                |

The team identified that design calculation NK-E-001 lists several components with maximum voltage limits that are less than the maximum voltages of 140 VDC. The team requested voltage data during the time that the battery equalize charging was in progress. The licensee provided the team data measurements that had been taken between April 10, 2018 and April 18, 2018. The data indicated that the actual NK01 bus voltage exceeded the 140 VDC procedure and calculation limit (up to 143 VDC for approximately 20 minutes during NK11 battery equalize charging). The team identified periods when components downstream of the Class 1E 125 VDC electrical distribution buses (with design limits less than 140 VDC) had been exposed to voltages that exceeded maximum design values for components listed in design calculation NK-E-001. The licensee did not have an analysis to address the concern pertaining to whether the equipment downstream of the NK01 bus could withstand voltages that exceeded design limits. Also, Procedure MPE E050Q-05 references a maximum equalizing voltage of 140 VDC for the battery banks.

According to licensee systems engineering personnel, this condition would only be expected during battery equalize charging activities. Section 7.2 of procedure MPE E050Q-05 requires that battery terminal voltage is measured and that potentiometer adjustments be made to obtain equalize values given in the table for equalize voltage range, but there were no steps that prohibited exceeding the 140 VDC maximum value. Furthermore, procedure STS NB-005, "Breaker Alignment Verification," does not reference any specific steps to ensure that the 140 VDC voltage limit would not be exceeded. Neither of the procedures referenced identify any actions to be taken when the voltage limit is exceeded.

Corrective Actions. On August 1, 2018, the licensee completed Operability Evaluation OE NK-18-005, to address the effect of the overvoltage condition on the 125 VDC battery, battery charger, and equalizer. The licensee determined that reasonable assurance exists that the systems, structures, or components associated with the operability evaluation remained capable of performing their specified safety function. According to updated information in Condition Report CR-00125361, a procedure change request (PCR) was initiated to add battery voltage monitoring to procedure MPE E050Q-05 to ensure maximum voltage values are not exceeded. Furthermore, updated information in Condition Report CR-00125468, indicated that an action was initiated to review previous performance of NK buses to determine the historical amount of overvoltage that may have occurred.

Corrective Action References: Condition Reports CR-00125361 and CR-00125468.

#### Performance Assessment:

Performance Deficiency: The licensee's failure to verify or check the adequacy of design calculation NK-E-001, "125 Volt Direct-Current (VDC) Class 1E Battery System Sizing, Voltage Drop and Short Circuit Studies," Revision 4, was a performance deficiency.

Screening: The team determined the performance deficiency was more than minor because it was associated with the Procedure Quality attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the licensee failed to verify or check the adequacy of design calculation NK-E-001, "125 Volt Direct-Current (VDC) Class 1E Battery System Sizing, Voltage Drop and Short Circuit Studies," Revision 4, regarding maximum allowed Class 1E 125 VDC voltage, and procedures involving Class 1E 125 VDC system components. There had been periods of time when components downstream of the Class 1E 125 VDC electrical distribution buses

(with design limits less than 140 VDC) had been exposed to voltages that exceeded maximum design values. Furthermore, procedure STS NB-005, "Breaker Alignment Verification," does not reference any specific steps to ensure that the 140 VDC voltage is not exceeded, and none of the procedures reference any actions to take when the voltage limit is exceeded.

**Significance:** The team assessed the significance of the finding using NRC Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," issued October 7, 2016. Using Exhibit 2, "Mitigating Systems Screening Questions," the team determined the finding to be of very low safety significance (Green) because the finding was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non-technical specification equipment; and did not screen as potentially risk significant due to seismic, flooding, or severe weather.

**Cross-Cutting Aspect:** The team determined that this finding had a crosscutting aspect in the area of Human Performance, Consistent Process, where Individuals use a consistent, systematic approach to make decisions. Risk insights are incorporated as appropriate. Specifically, the licensee did not use a consistent, systematic approach for reviewing components downstream of the battery chargers for overvoltage conditions as identified in the design basis calculation. [H.13]

#### Enforcement:

**Violation:** Title 10 CFR Part 50, Appendix B, Criterion III, "Design Control," states in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions. The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program."

Contrary to the above, prior to August 1, 2018, the licensee failed to verify or check the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program. Specifically, the licensee failed to verify or check the adequacy of design calculation NK-E-001, Revision 4, "125 Volt Direct-Current (VDC) Class 1E Battery System Sizing, Voltage Drop and Short Circuit Studies," and procedures involving Class 1E 125 VDC system components, by not recognizing that the actual 125 VDC Class 1E bus voltages had exceeded the maximum design limit voltages for downstream equipment identified in design calculation NK-E-001. Also, the licensee had not placed any voltage limits in any procedures for the 125 VDC Class 1E System which had actually exceeded the design limit of 140 VDC.

**Disposition:** This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

|   |   |
|---|---|
| Licensee-Identified Non-Cited Violation   | 71152—Problem Identification and Resolution |
| <p>This violation of very low safety significance was identified by the licensee and has been entered into the licensee corrective action program and is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.</p>   |   |
| <p>Violation: Title 10 CFR Part 50, Appendix B, Criterion XVI, “Corrective Action,” states, in part, “Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected.”</p> <p>Contrary to the above, prior to 2015, the licensee failed to promptly identify and correct a repetitive deficiency or nonconformance. Specifically, the licensee had identified a leaking flange on the residual heat removal heat exchanger since 1997. Prior to 1997 a different data base had been used to record boric acid leakage, and the data was not available during the inspection. Over the years since plant startup, the licensee had been diligent in completing boric acid evaluations on the leaking residual heat removal heat exchanger flange, indicating minimal wastage of the flange closure studs and nuts that had been subjected to boric acid. Corrective actions included cleaning up the boric acid leakage, and checking or re-torquing the closure nuts. These measures did not correct the problem of the leaking heat exchanger flange.</p> <p>In 2015 the licensee completed an in-depth engineering evaluation of the leaking flange, including discussions with the heat exchanger manufacturer. New corrective measures included changing the torque values on the closure studs and nuts. The licensee is still evaluating the results of the corrective actions taken to preclude further leakage.</p> <p>Significance/Severity Level: The team assessed the significance of the finding using NRC Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” issued October 7, 2016. The team concluded the finding was of very low safety significance (Green) because all questions in Exhibit 2 could be answered no.</p> <p>Corrective Action Reference(s): Condition Reports CR-00057242, CR-00057267, and CR-00125123.</p> |   |

**EXIT MEETINGS AND DEBRIEFS**

On August 2, 2018, the team presented the initial results of this design basis assurance inspection to Mr. Jamie McCoy, Site Vice President, and other members of the licensee staff. On October 1, 2018, a phone call was held with Mr. Steve Smith, Vice President, Engineering, and other members of the licensee staff, to clarify the characterization of the identified findings. On November 1, 2018, an additional phone call was held with Mr. Daljit Mand, Director, Engineering, and other members of the licensee staff, to revise the characterization of the identified findings. On November 13, 2018, a final exit phone call was held with Mr. Gabe Fugate, Director, Plant Support, and other members of the licensee staff, to identify changes to the inspection findings as a result of an enforcement policy review. The team verified no proprietary information was retained or documented in this report.

## DOCUMENTS REVIEWED

### Calculations

| <u>Number</u>    | <u>Title</u>  | <u>Revision</u> |
|------------------|---|-----------------|
| A-06-W           | Thermal Capability of Electrical Penetration Assemblies (EPA) Versus Dual Short Circuit Protection to Satisfy Reg. [Regulatory] Guide 1.63                    | 007             |
| H-06             | Protective Relays   | 10              |
| H-08             | System NB Protective Relays   | 5               |
| H-15             | Provide RCPM Protective Relay Settings (Class 1E) for UV & UF   | 4               |
| NK-E-001         | 125 VDC Class 1E Battery System Sizing, Voltage Drop and Short Circuit Studies  | 4               |
| NN-E-001         | Class 1E NN Inverter Loading  | 0               |
| P-009A-010-CN001 | Piping Stress Analysis for Essential Service Water System, Train B  | June 20, 2017   |
| PK-E-001         | Non-Class 1E 125 Volt DC System   | 3               |
| WCN-023-CALC-001 | Transient water hammer analysis of the essential service water system following a LOOP with a higher setpoint for the vacuum breakers at the top of the loop. | 1               |
| XX-E-006         | AC System Analysis  | 8               |

### Condition Reports (CR-)

|          |          |          |          |             |
|----------|----------|----------|----------|-------------|
| 00056641 | 00077640 | 00098218 | 00106993 | 00118952    |
| 00057242 | 00077791 | 00098844 | 00107885 | 00118954    |
| 00057267 | 00077792 | 00099349 | 00107915 | 00119043    |
| 00069540 | 00077794 | 00099930 | 00109450 | 00119167-01 |
| 00070051 | 00082790 | 00099956 | 00109656 | 00120213    |
| 00070256 | 00085924 | 00099993 | 00109733 | 00121267    |
| 00070380 | 00088577 | 00100863 | 00109893 | 00121828    |
| 00070718 | 00088665 | 00101289 | 00110094 | 00122600    |
| 00071246 | 00091857 | 00101942 | 00110420 | 00123328    |

Condition Reports (CR-)

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|          |          |             |          |          |
|----------|----------|-------------|----------|----------|
| 00071977 | 00092106 | 00102416-01 | 00110546 | 00123329 |
| 00072165 | 00092324 | 00103150    | 00111571 | 00123660 |
| 00072426 | 00093748 | 00103658    | 00112981 | 00123843 |
| 00072496 | 00093748 | 00103698    | 00116051 | 00123902 |
| 00073206 | 00094365 | 00103918    | 00116852 | 00123908 |
| 00073240 | 00094366 | 00104699    | 00117311 | 00124694 |
| 00073244 | 00094627 | 00105147    | 00117441 | 00124822 |
| 00073443 | 00097769 | 00105480    | 00117639 | 00124997 |
| 00073445 | 00098177 | 00106923    | 00118853 |          |

Condition Reports Generated During the Inspection (CR-)

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|          |           |          |          |          |
|----------|-----------|----------|----------|----------|
| 00125081 | 00125166  | 00125310 | 00125413 | 00125489 |
| 00125111 | 00125183  | 00125350 | 00125414 | 00125490 |
| 00125112 | 00125184  | 00125356 | 00125447 | 00125492 |
| 00125123 | 00125191  | 00125361 | 00125456 | 00125513 |
| 00125136 | 00125225  | 00125362 | 00125457 | 00125521 |
| 00125139 | 00125227  | 00125370 | 00125458 | 00125533 |
| 00125152 | 00125255  | 00125405 | 00125468 | 00125536 |
| 00125158 | 00125255a | 00125406 | 00125487 | 00125557 |

Design Change Packages

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| <u>Number</u> | <u>Title</u>   | <u>Revision</u> | <u>Date</u> |
|---------------|--|-----------------|-------------|
| 014831        | Improved RCP Passive Shutdown Seal   | 0               |             |
| 015040        | Nitrogen Backup for EJHCV0606 and EJHCV0607  | 01              |             |
| 015070        | NN Power to GK Damper  | 0               |             |
| 015081        | New RHR Pressure Transmitter EJPIT0027 and NPIS [Nuclear Plant Information System] Point | 0               |             |

### Design Change Packages

| <u>Number</u> | <u>Title</u>  | <u>Revision Date</u> |
|---------------|---|----------------------|
| 015214        | ESW Water Hammer Vacuum Breaker Valves Spring Replacement | 0                    |
| 14923         | Restore Regulatory Compliance for 10 480 V MOVs           | 0                    |
| CCP 11897     | Transformer XNB02 Tap Change                              | 2                    |
| DCP 13271     | Turbine Trip Wiring Changes in Support of DCP 011354      | 1                    |
| FCN 015251    | EDG Exciter Power Potential Transformer Protection        | 1                    |
| MCP 14893     | Switchgear Racking Mechanism Chain Repair                 | 0                    |
| PMR 04637     | RHR Heat Exchanger Outlet Valve Nitrogen Backup Port      | 0                    |

### Drawings

| <u>Number</u> | <u>Title</u>   | <u>Revision</u> |
|---------------|--|-----------------|
| 5736          | Vertical Residual H.E. Outline Drawing                           | 5               |
| 5739          | Vertical Residual Heat Exchanger Details                         | 3               |
| 5740          | Vertical Residual Heat Exchanger Details                         | 4               |
| E-009B-00025  | Breaker Schematic G.E. 13.8KV                                    | W02             |
| E-02PA01      | Logic Diagram, Unit Auxiliary Source 13.8kV Bus Feeder Breakers  | 4               |
| E-11001       | Main Single Line Diagram   | 11              |
| E-11005       | List of Loads Supplied by Emergency Diesel Generator             | 58              |
| E-11010       | DC [Direct Current] Main Single Line Diagram                     | 11              |
| E-11010       | DC [Direct Current] Main Single Line Diagram                     | 11              |
| E-11010A      | DC [Direct Current] Main Single Line Diagram (PK03 And PK04 Bus) | 05              |

Drawings

| <u>Number</u>       | <u>Title</u>   | <u>Revision</u> |
|---------------------|--|-----------------|
| E-11010A            | DC [Direct Current] Main Single Line Diagram (PK03 And PK04 Bus)               | 05              |
| E-11023             | Relay Setting Tabulation & Coordination Curves System NB                       | 10              |
| E-11030             | Relay Setting Tabulation RCPM UV & UF Monitors                                 | 8               |
| E-11032             | Substation and Plant Transformer Tap Settings                                  | 5               |
| E-11MA01            | Main Generator Single Line Metering and Relaying Diagram                       | 33              |
| E-11NB02            | Lower Medium Voltage Sys. Class 1E 4.16 kV Single Line Meter and Relay Diagram | 10              |
| E-11PA01            | Higher Medium Voltage System 13.8 kV Single Line Meter & Relay Diagram         | 13              |
| E-11PK01            | Non-Class 1E 125V System Meter & Relay Diagram                                 | 13              |
| E-12NF01            | Load Shedding and Emergency Load Sequencing Logic                              | 4               |
| E-13BB01            | Schematic Diagram Reactor Coolant Pumps  | 18              |
| E-13N03             | Schematic Diagram RHR Pump MOV   | 8               |
| EID-0004            | Pool Parameters  | 3               |
| IP-M-18EF13-010-A-1 | Hanger Details Small Pipes, Essential Water System                             | 0               |
| KD-7496             | One Line Diagram   | 67              |
| KD-7496A            | Distribution System Equipment Lineup Limitations                               | 10              |
| KL-1909             | Logic Block Diagram, Load Shedding & Emergency Load Sequencing System (LSELS)  | E               |
| M-018-00077         | Electrical Schematic Diesel Gen. [Generator] Control NE107                     | W01             |
| M-018-00077         | Electrical Schematic Diesel Gen. [Generator] Control NE106                     | W20             |
| M-018-00301         | Interconnection Wiring Diagram (NE107)   | W08             |

Drawings

| <u>Number</u>           | <u>Title</u>  | <u>Revision</u> |
|-------------------------|---|-----------------|
| M-12BB01                | Piping & Instrumentation Diagram Reactor Coolant System   | 37              |
| M-12BB04                | Piping & Instrumentation Diagram Reactor Coolant System   | 24              |
| M-12EF01                | Piping and Instrumentation Diagram, Essential Service Water System  | 29              |
| M-12EF02                | Piping and Instrumentation Diagram, Essential Service Water System  | 42              |
| M-12EJ01                | Piping & Instrumentation Diagram Residual Heat Removal System   | 55              |
| M-12E-J01               | P&ID, Residual Heat Removal System  | 52              |
| M-12EM01                | Piping & Instrumentation Diagram High Pressure Coolant Injection System   | 45              |
| M-12EP01                | Piping & Instrumentation Diagram Accumulator Safety Injection   | 16              |
| M-223F-00003            | CRISPIN Model VR-41 Model Relief Check Valve Flanged Ends Size 4 Fig. 150 - VR  | W04             |
| M-724-00761             | Motor Operated Gate Valve   | 6               |
| WIP-J-110-00660-W11-A-1 | Wiring Diagram Termination Area Rack HF187A Separation Group 5  | 00              |
| WIP-J-110-00671-W10-A-1 | Rack HF187A & 187B Loading Standardized Nuclear Unit Power Plant System Applicable to Unit 1, Bechtel P.O. 10466-J-110-1                | 00              |
| WIP-J-110-01026-000-A-1 | Instrument Loop Diagram Residual Heat Removal System RHR Pump Discharge Header Pressure   | 00              |
| WIP-J-14EJ08-002-A-1    | Instrument Isometric Drawing RHR [Residual Heat Removal] HX [Heat Exchanger] 1B to ACCUM [Accumulator] INJ [Injection] LP [ Loop] 3 & 4 | 00              |
| WIP-J-17P39-000-A-1     | Instrument Mounting Detail Pressure Transmitter (Rosemount) Packed Manifold   | 01              |
| WIP-M-12EJ01-053-A-1    | Piping and Instrumentation Diagram Residual Heat Removal System   | 00              |
| WIP-M-13EJ10-002-A-1    | Schematic Diagram Instrumentation   | 00              |

Procedures

| <u>Number</u> | <u>Title</u>   | <u>Revision</u> |
|---------------|--|-----------------|
| 18-0022       | Essential Reading – LBLOCA HL Break  | 0               |
| AI 16C-006    | Troubleshooting  | 8               |
| AI 16C-007    | Work Order Planning  | 56              |
| AI 16F-001    | Evaluation of Boric Acid Leakage   | 10              |
| AI 21-016     | Operator Time Critical Actions Validation                                      | 14              |
| AI 23O-001    | Functional Importance Determination  | 7               |
| AI 26C-004    | Technical Specification Application for Containment Isolation Valves           | 7               |
| AI 26C-004    | Technical Specification Application for Containment Isolation Valves           | 7A              |
| AI 28A-010    | Screening Condition Reports  | 29A             |
| AI 28A-010    | Screening Condition Reports  | 21              |
| AI 28A-100    | Condition Report Resolution  | 14              |
| AI 28B-005    | Evidence and Action Matrix   | 4               |
| AI 30B-005    | Development and Conduct of Simulator Activities for Licensed Operator Training | 31              |
| AI 30B-015    | Licensed Operator Requalification Examination Guidelines                       | 12              |
| ALR 501       | Standby Diesel Engine System Control Panel KJ-121                              | 28              |
| AP 05-002     | Disposition and Change Packages  | 30              |
| AP 05-002     | Disposition and Change Package   | 30              |
| AP 05-005     | Design, Implementation and Configuration Control of Modifications              | 22              |
| AP 05-005     | Design, Implementation and Configuration Control of Modifications              | 22, 26          |

Procedures

| <u>Number</u> | <u>Title</u>   | <u>Revision</u> |
|---------------|--|-----------------|
| AP 05-013     | Review of Vendor Technical Documents                             | 8               |
| AP 05-013     | Review of Vendor Technical Documents                             | 8               |
| AP 05-024     | Minor Change Package   | 0               |
| AP 05C-004    | Basic Engineering Dispositions                                   | 0, 1            |
| AP 15C-001    | Procedure Writers Guide  | 31              |
| AP 15C003     | Procedure Users Guide for Abnormal Plant Conditions              | 37              |
| AP 16C-006    | MPAC Work Request/Work Order Process Controls                    | 21A             |
| AP 16F-001    | Boric Acid Corrosion Control Program                             | 9               |
| AP 20E-001    | Industry Operating Experience Program                            | 27              |
| AP 21-001     | Conduct of Operations  | 82              |
| AP 21-004     | Operator Response Time Program                                   | 4B              |
| AP 21A-002    | Diverse and Flexible Coping Mitigation Strategies (FLEX) Program | 2               |
| AP 21C-001    | Wolf Creek Substation  | 21              |
| AP 22A-001    | Screening, Prioritization and Pre-Approval                       | 22              |
| AP 26A-003    | 10 CFR 50.59 Reviews   | 14              |
| AP 26C-004    | Operability Determination and Functionality Assessment           | 35              |
| AP 28-001     | Operability Evaluations  | 25              |
| AP 28-007     | Nonconformance Control   | 10              |
| AP 28-011     | Resolving Degraded or Nonconforming Conditions Impacting SSCs    | 7               |
| AP 28A-100    | Corrective Action Program  | 23              |

Procedures

| <u>Number</u> | <u>Title</u>  | <u>Revision</u> |
|---------------|---|-----------------|
| AP 28A-100    | Corrective Action Program   | 22              |
| BD EMG E-0    | Reactor Trip of Safety Injection  | 28              |
| BD EMG E-1    | Loss of Reactor or Secondary Coolant  | 19              |
| BD EMG E-2    | Faulted SG Isolation  | 14              |
| BD EMG ES-12  | Transfer to Cold Leg Recirculation  | 16              |
| EMG E-0       | Reactor Trip or Safety Injection  | 39A             |
| EMG E-1       | Loss of Reactor or Secondary Coolant  | 29              |
| EMG E-2       | Faulted SG Isolation  | 22              |
| EMG ES-12     | Transfer to Cold Leg Recirculation  | 23              |
| EMG FR-C2     | Response to Degraded Cooling  | 17              |
| EMG FR-P1     | Response to Imminent Pressurized Thermal Shock Conditions                                       | 22              |
| IP-ENG-001    | Standard Design Process   | 0               |
| KMS-4         | Mechanical Standard for Bolting   | 4               |
| KMS-6         | Fastener Specification for Use at the Wolf Creek General Station in Both ASME and Non-ASME/ANSI | 3               |
| M-10EJ        | System Description Residual Heat Removal  | 4               |
| MPE E009-01   | Siemens Breaker Cubicle Maintenance, Testing, and Swapping                                      | 6               |
| MPE E009Q-01  | 13.8 kV and 4.16 kV Switchgear Inspection and Testing   | 35              |
| MPE E009Q-01  | 13.8 KV And 4.16 KV Switchgear Inspection and Testing   | 33A             |
| MPE E009Q-01  | 13.8 KV And 4.16 KV Switchgear Inspection and Testing   | 35              |

Procedures

| <u>Number</u>        | <u>Title</u>   | <u>Revision</u> |
|----------------------|--|-----------------|
| MPE E050Q-05         | Battery Equalizing Procedure   | 14              |
| MPM M712Q-01         | Reactor Coolant Pump Seal Removal/Installation   | 25              |
| MPM M712Q-02         | Reactor Coolant Pump Seal Cartridge Inspection/Rebuild                                       | 10              |
| OFN BB-005           | RCP Malfunctions   | 27              |
| OFN BB-005           | RCP Malfunctions   | 28              |
| OFN EG-004           | CCW System Malfunctions  | 18B             |
| OFN EG-004           | CCW System Malfunctions  | 18B             |
| PWROG-14006-P        | Implementation Guide for Generation III Westinghouse Seal                                    | 0-B             |
| PWROG-16030-NP       | Time Critical Action/Time Sensitive Action Program Standard PA-PSC-0840                      | August, 2016    |
| Record of Completion | Flex Support Guideline (FSG) Validation Process  | 2               |
| STN EJ-205           | RHR System Valve Test  | 5               |
| STN TCA-001          | Manual Time Critical Action Timing   | 5               |
| STS AL-103           | TDAFW Pump Inservice Test  | 73              |
| STS AL-104           | TDAFW ESF Response Time Test   | 24              |
| STS AL-211           | TDAFW Comprehensive Pump Testing and System Flow Path Verification and Inservice Check Valve | 37              |
| STS BB-207           | RCP Seal Water Injection Inservice Check Valve Test  | 8               |
| STS BN-208A          | RWST to RHR Pump A Suction Valve Test  | 3A              |
| STS BN-208B          | RWST to RHR Pump B Suction Valve Test  | 3A              |
| STS IC-740A          | RHR Switchover to Recirculation Sump Test – Train A  | 31              |

Procedures

| <u>Number</u> | <u>Title</u>  | <u>Revision</u> |
|---------------|---|-----------------|
| STS IC-740B   | RHR Switchover to Recirculation Sump Test – Train B                         | 28C             |
| STS IC-805B   | Channel Calibration of NB02 Grid Degraded Voltage, Time Delay Trip          | 16              |
| STS IC-902A   | Actuation Logic Test Train A Residual Heat Removal Suction Isolation Valves | 4A              |
| STS MT-019A   | 125 VDC Class 1E Quarterly Inspection For NK11 and NK13 Batteries           | 1B              |
| STS MT-028    | Penetration Breaker Inspection  | 25              |
| STS MT-028    | Penetration Breaker Inspection  | 26              |
| STS MT-079    | ESW System Water Hammer Inservice Check Valve Test                          | 2               |
| STS NB-005    | Breaker Alignment Verification  | 34              |
| STS NB-005    | Breaker Alignment Verification  | 35              |
| STS PE-007    | Periodic Verification of Motor Operated Valves                              | 5               |
| STS PE-19B    | RHR Suction Valve Leak Test   | 23              |
| STS VT-001    | Verification of OMN-1, MOV Exercise Requirements                            | 5               |
| SYS NB-200    | Transferring XNB01 Supply Between SL7 and #7 Transformer                    | 19              |
| SYS NK-331    | De-energizing NK Buses  | 18              |
| TSO 0101-21   | Division of Responsibility of the Wolf Creek Substation                     | July 13, 2018   |
| TSO 0400-02   | Wolf Creek 345 kV Bus Voltage   | April 30, 2018  |
| TSO 0414-02   | Monitoring Wolf Creek Contingency Study 345 kV Bus                          | April 30, 2018  |
| WCAP-16755-NP | Operator Time Critical Action Program Standard                              | Rev. 0          |

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| <u>Number</u> | <u>Title</u>   | <u>Revision Date</u> |
|---------------|--|----------------------|
| 6998D62       | Colt Industries Type "WNR" Volt Reg. [Voltage Regulation] & Excitation System  | January 17, 1983     |
| E-009-00223   | Instruction Manual for 13.8 kV Switchgear  | W33                  |
| E-009-00242   | Instruction Manual for 4.16 kV Class 1E Switchgear   | W31                  |
| E-009-00258   | IEEE 323 Qualification Program General Electric Co.  | July 2, 1984         |
| E-009-00342   | Metal-Clad Switchgear  | W09                  |
| E-009B-00001  | Qualification Plan for Siemens 5-AF-GER-350-1200-78 and 5-3AF-GER-350-2000-78  | W05                  |
| E-009B-00006  | Third Party Qualification Plan for Siemens 52STA Switch Mechanisms   | W01                  |
| E-009B-00009  | Instruction Manual for Siemens Type 3AF-GER Vertical Lift Direct Replacement Circuit Breakers  | W06                  |
| E-009B-00018  | Third Party Qualification Report for Siemens Types 5-3AF-GER-350-1200-78 and 5-3AF-GER-350-2000-78 Vertical Lift Vacuum Circuit Breakers and 52STA Switch Mechanisms | W01                  |
| E-009B-00029  | Siemens Vacuum Circuit Breakers (Vehicle)  | W02                  |
| E-009B-00029  | Siemens Circuit Breakers (Vehicle) Type GER 5kV to 15kV  |                      |
| E-009B-00044  | Siemens Type-3AFS Vacuum Circuit Breakers  | W01                  |
| E-009B-00044  | Siemens Type-3AFS Vacuum Circuit Breakers  | W01                  |
| E-020-00055   | Installation and Maintenance Instructions – AV-Line Switchboards (GEH-2621C)   |                      |
| E-020-00055   | Instructions (GEH-3042A) – Mounting and Connecting Hardware for QMR Double Branch Panelboard Units, 30-100 Amperes   |                      |
| E-020-00055   | Instructions (GEH-3043) – Mounting and Connecting Hardware for QMR Double Branch Panelboard Units, 30-600 Amperes  |                      |
| E-050A-00011  | Lucent Technologies Lineage 2000 Round Cell Battery  | W03                  |

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| <u>Number</u>            | <u>Title</u>  | <u>Revision Date</u> |
|--------------------------|---|----------------------|
| M-021-00061              | Instruction Manual for Auxiliary Feedwater Pumps  | W29                  |
| M-072-00024              | Operation/Maintenance for Cooling Water Heat Exchangers                                       | W07                  |
| M-072-00052              | Instruction Manual for Auxiliary Heat Exchangers  | W11                  |
| M-223F-00003             | Crispin Model VR-41 Model Relief Check Valve Flanged Ends Size 4 Fig. 150 - VR                | W04                  |
| M-712-00068              | Instruction Manual for Reactor Coolant Pump   | W38                  |
| WIP-M-223F-00004-W01-A-1 | Crispin Mode VR-41 Relief Check Valve Flanged Size 4 150 LB Carbon Steel With Resilient Seat. | W02                  |

Work Orders (WO)

|               |               |               |               |               |
|---------------|---------------|---------------|---------------|---------------|
| 02-242150-013 | 12-359883-000 | 13-381325-001 | 15-399466     | 16-420373-000 |
| 05-273137-002 | 13-364867-000 | 13-381325-002 | 15-399467     | 16-420373-001 |
| 05-277630     | 13-376820-000 | 14-385969-000 | 15-401047-002 | 17-421126-000 |
| 07-295699     | 13-376820-000 | 14-385969-001 | 15-401047-005 | 17-423640-000 |
| 12-357898     | 13-376820-005 | 14-394162     | 15-404075-000 | 17-434455-000 |
| 12-357899     | 13-376846-000 | 15-396644-000 | 15-404395-000 | 17-434455-001 |
| 12-359817-000 | 13-381325-000 | 15-398783     | 15-409923-001 |               |

Miscellaneous

| <u>Number</u> | <u>Title</u>  | <u>Revision Date</u> |
|---------------|---|----------------------|
|               | NERC Interface Coordination Agreement for the Wolf Creek Substation | April 28, 2018       |
| 015214        | Applicability Determination   | 01                   |
| 015214        | 50.59 Screen  | 01                   |
| 07381         | Gaskets and Bolting Change Package                                  | 1                    |

Miscellaneous

| <u>Number</u>                               | <u>Title</u>   | <u>Revision<br/>Date</u> |
|---|--|--------------------------|
| 14831                                       | Applicability Determination  | 0                        |
| 14831                                       | 10CFR 50.59 Screening  | 0                        |
| 15040                                       | Applicability Determination  | 0                        |
| 15040                                       | 10 CFR 50.59 Screening   | 0                        |
| 17-00365                                    | Wolf Creek Generating Station, Unit 1 Safety Evaluation Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051 | August 2, 2017           |
| 59 2012-0003                                | DCP 14016 10 CFR 50.59 Evaluation  | 0                        |
| BED for CR 46330 Rev. 1                     | Evaluation of Voids in Suction Piping for Auxiliary Feed Water Pumps   | 1                        |
| BED for SWO 15-401047-002 and 15-401047-005 | Expected Life Evaluation for ESW Vacuum Breaker Valves   | March 10, 2016           |
| E-009                                       | Technical Specification for Metal-Clad Switchboard   | 8                        |
| E-020                                       | Technical Specification for DC Distribution Switchboards for the Standardized Nuclear Unit Power Plant System (SNUPPS)   | 08                       |
| E-020                                       | Specification: DC Distribution Switchboards  | 09                       |
| E-058                                       | Technical Specification for 600 Volt Single & Multiple Conductor Copper Power Cable for Wolf Creek Nuclear Operating Corporation   | 13                       |
| E-10NB                                      | System Description, Lower Medium Voltage System— 4.16 kV (Class 1E Power System  | 0                        |
| E-10NE                                      | System Description, Standby Power Supply System  | 1                        |
| E-10NF                                      | System Description, Load Shedding and Emergency Load Sequencing  | 1                        |
| E-10NK                                      | System Description for 125-Volt DC System (Class 1E Power System)  | 07                       |

Miscellaneous

| <u>Number</u>     | <u>Title</u>   | <u>Revision Date</u> |
|-------------------|--|----------------------|
| E-10PA            | System Description, Higher Medium Voltage System—<br>13.8 kV (Non-Class 1E Power System)   | 0                    |
| E-10PA            | System Description for Higher Medium Voltage System<br>– 13.8 KV (Non-Class 1E Power System)                                       | 00                   |
| EFV0482           | IST Basis Report for Valve EF V0482  | N/A                  |
| EFV0484           | IST Basis Report for Valve EF V0484  | N/A                  |
| EMG C-12          | LOCA Outside Containment   | 15                   |
| ET-17-0003        | Docket no. 50-482: Wolf Creek Nuclear Operating<br>Corporation's Compliance Report for the<br>Implementation of Order EA-12-049    | January 19, 2017     |
| FD-SL-01-WC       | Functional Description, Auxiliary Power System   | 5                    |
| LR1400302         | Reactor Coolant Pumps (RCP)  | 0                    |
| LTR-RES-13-108    | Input to an Operability Determination Associated with<br>the Shutdown Seal (SDS) Failure to Actuate During<br>Post-Service Testing | 0                    |
| M-021-00061       | Instruction Manual For Auxiliary Feedwater Pumps   | W29                  |
| M-10AL            | Auxiliary Feedwater System, System Description   | 0                    |
| M-10BB            | Reactor Coolant System   | 04                   |
| M-10BB            | System Description for Reactor Coolant Systems   | 04                   |
| M-10EF            | System Description Essential Service Water System  | 12                   |
| M-712-00210       | Use of Westinghouse Shield Passive Shutdown Seal<br>for Flex Strategies  | 1                    |
| MGE LT-006        | Maintenance of Limotorque Valve Operators Type<br>SMB-0 Thru 4   | 9                    |
| NEI 12-06 [Rev 5] | Diverse and Flexible Coping Strategies (FLEX)<br>Implementation Guide  | 5                    |
| NEI 16-07         | Improving the Effectiveness of Issue Resolution to<br>Enhance Safety and Efficiency  | 0                    |

Miscellaneous

| <u>Number</u>                      | <u>Title</u>  | <u>Revision Date</u>               |
|------------------------------------|---|------------------------------------|
| NK                                 | System Health Report for 125 VDC (1E)   | (July 1, 2017 – December 31, 2017) |
| NRC Final Safety Evaluation Report | Topical Report WCAP-17100-P/NP, REVISION 1, "PRA Model for the Westinghouse Shut Down Seal AL" (PA-RMSC-0499) Pressurized Water Reactor Owners Group, Project no. 694 | April 29, 2011                     |
| NSAL-13-6                          | SHIELD Passive Thermal Shutdown Seal (SDS) Failure to Actuate During Post-Service Test  | July 26, 2013                      |
| OE NK-18-005                       | Operability Evaluation: NK001, NK002, NK003, NK004 125 VDC Bus Switchboard and Component Downstream of the NK Bus Are Listed in Calculation NK-E-001 Appendix E       | July 31, 2018                      |
| OFN BB-031                         | Shutdown LOCA   | 32                                 |
| OFN EJ-15                          | Loss of RHR Cooling   | 29B                                |
| ONF EJ-40                          | CL Recirculation During Mode 3, with Accumulator Isolated in Mode 4, 5, or 6  | 8                                  |
| PA                                 | System Health Report for High-Medium Voltage 13.8 kV  | (July 1, 2017 – December 31, 2017) |
| PM FILE 49330                      | A RCP no. 3 Seal Leak-off Flush   | n/a                                |
| QH-2018-1612                       | USAR Self-Assessment for 2018 DBAI  | July 19, 2018                      |
| REVISION TO JLD-ISG-2012-01        | Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events               | 2                                  |
| SCA-05-0028                        | Safety Classification Analysis, NB Syst. Magna Blast Breaker Elevating Mechanism Roller Assembly  | 0                                  |
| System Health Report               | Reactor Coolant System (BB)   | July 1, 2017 – December 31, 2017   |
| System Health Report               | Auxiliary Feedwater System AL, AP, FC-1   | July 1, 2017 – December 31, 2017   |

Miscellaneous

| <u>Number</u>      | <u>Title</u>  | <u>Revision<br/>Date</u> |
|--------------------|---|--------------------------|
| TDAFWP Test Trends | IST Hydraulic and Vibration Trends for TDAFWP and Screen Shots from Data Program  | Various dates            |
| WO 14-0023         | Docket No. 50-482: Request for Schedule Relaxation of NRC Order EA-12-049, Requirement IV.A.2, at Wolf Creek Generating Station | March 31, 2014           |

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INSPECTION REPORT 05000482/2018010 DTAED NOVEMBER 14, 2018

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