

JAN 16 1990

In Reply Refer To:
Docket: STN 50-482/89-27

Wolf Creek Nuclear Operating Corporation
ATTN: Bart D. Withers
President and Chief Executive Officer
P.O. Box 411
Burlington, Kansas 66839

Gentlemen:

Thank you for your letter of December 20, 1989, in response to our letter and Notice of Violation dated November 20, 1989. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By:
Samuel J. Collins

Samuel J. Collins, Director
Division of Reactor Projects

cc:
Wolf Creek Nuclear Operating Corp.
ATTN: Gary Boyer, Plant Manager
P.O. Box 411
Burlington, Kansas 66839

Shaw, Pittman, Potts & Trowbridge
ATTN: Jay Silberg, Esq.
1800 M Street, NW
Washington, D.C. 20036

Public Service Commission
ATTN: Chris R. Rogers, P.E.
Manager, Electric Department
P.O. Box 360
Jefferson City, Missouri 65102

RIV:C:DRP/D
EJHoller;df
1/11/90

D:DRP
SJCollins
1/16/90

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Wolf Creek Nuclear Operating
Corporation

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U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Wolf Creek Nuclear Operating Corp.
ATTN: Otto Maynard, Manager
Regulatory Services
P.O. Box 411
Burlington, Kansas 66839

Kansas Corporation Commission
ATTN: Robert Elliot, Chief Engineer
Utilities Division
4th Floor - State Office Building
Topeka, Kansas 66612-1571

Office of the Governor
State of Kansas
Topeka, Kansas 66612

Attorney General
1st Floor - The Statehouse
Topeka, Kansas 66612

Chairman, Coffey County Commission
Coffey County Courthouse
Burlington, Kansas 66839

Kansas Department of Health
and Environment
Bureau of Air Quality & Radiation
Control
ATTN: Gerald Allen, Public
Health Physicist
Division of Environment
Forbes Field Building 321
Topeka, Kansas 66620

U.S. Nuclear Regulatory Commission
ATTN: Senior Resident Inspector
P.O. Box 311
Burlington, Kansas 66839

U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Wolf Creek Nuclear Operating
Corporation

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bcc to DMB (IE01)

bcc distrib. by RIV:

R. D. Martin

Section Chief (DRP/D)

DRSS-FRPS

RIV File

MIS System

Project Engineer (DRP/D)

D. V. Pickett, NRR Project Manager (MS: 13-D-18)

Resident Inspector

DRP

R. DeFayette, RIII

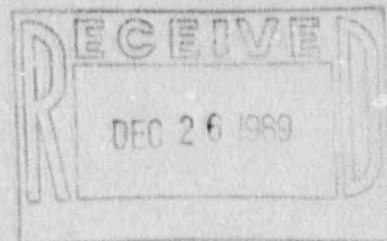
SRI, Callaway, RIII

RSTS Operator

Lisa Shea, RM/ALF

DRS

WOLF CREEK
NUCLEAR OPERATING CORPORATION



Bart D. Withers
President and
Chief Executive Officer

December 20, 1989

WM 89-0275

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Reference: Letter dated November 20, 1989 from S. J. Collins, NRC,
To B. D. Withers, WCNOG

Subject: Docket No. 50-482: Response to Violation 482/8927-01

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) response to violation 482/8927-01, which was documented in the Reference. Violation 482/8927-01 involved the failure to properly perform an Essential Service Water surveillance requirement.

If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,

Bart D. Withers
President and
Chief Executive Officer

BDW/aem

Attachment

cc: B. L. Bartlett (NRC), w/a
E. J. Holler (NRC), w/a
R. D. Martin (NRC), w/a
D. V. Pickett (NRC), w/a

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Violation (482/8927-01): Technical Specification Surveillance Requirement Improperly Performed

Finding:

Technical Specification (TS) Surveillance Requirement 4.6.2.3.a.2, "Containment Cooling System," requires, in part, that each group of containment cooling fans shall be demonstrated operable at least once per 31 days by verifying a cooling water flow rate of greater than or equal to 2200 gpm to each cooler group.

TS Basis 3/4.6.2.3 states, in part, the operability of the containment cooling system ensures that the containment air temperature will be maintained within limits during normal operations.

Contrary to the above, the licensee's test procedure performed from July 9, 1987, through June 2, 1989, was unable to achieve 2200 gpm flow through the normal valve lineup and required that the post loss of coolant accident (LOCA) lineup be in place in order to achieve the required normal flow.

This is a Severity Level IV violation. (Supplement I)(482/8927-01)

Reason For Violation:

During the period March, 1985, through June, 1989, various combinations of pumps in operation and valve lineups were utilized to satisfy TS Surveillance Requirement 4.6.2.3.a.2. The combinations used were not viewed as abnormal lineups. Consequently, it was assumed that these system configurations satisfied the intent of the TS Surveillance Requirement. Each change in the testing methodology was reviewed and approved in accordance with normal station practices. Throughout this time period, the containment air temperature was maintained within limits, during normal operations as discussed in TS Basis 3/4.6.2.3.

TS Basis 3/4.6.2.3 states, in part, the operability of the containment cooling system ensures that the containment air temperature will be maintained within limits during normal operations. The intent of this basis is to ensure that degrading flow conditions are properly evaluated; even though accident requirements and normal operating requirements are satisfied.

Corrective Steps Which Have Been Taken And Results Achieved

On June 2, 1989, the surveillance procedure utilized to fulfill TS Surveillance Requirement 4.6.2.3.a.2 was revised to utilize the normal service water pump flow through the normally open bypass valves (EF HV-47 and -48). Should other lineups be required to satisfy the required flow, a formal evaluation will be initiated of the condition of the containment coolers. As stated in Inspection Report 482/8927, this method of testing clearly satisfies the intent of this Surveillance Requirement.

Attachment to WM 89-0275
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Corrective Steps Which Will Be Taken To Avoid Further Violations:

WCNOC personnel recently completed a detailed review of TS Surveillance Requirements to ensure that each item is properly addressed in surveillance procedures. Therefore, there is a high degree of confidence that all other TS required surveillance testing is being performed in a manner consistent with the intent of the TS requirement.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.