

UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-8064

MAR 2 6 1993

Docket: STN 50-482 License: NPF-42

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

SUBJECT: NRC INSPECTION REPORT 50-482/92-32 RESPONSE

Thank you for your letter of March 15, 1993, in response to our letter and Notice of Violation dated February 1, 1993. Your response indicated that the instructions for removing the bearing from the shaft of a spent fuel pool cooling pump allowed the craft to use experience and training to select an appropriate tool to remove the bearing. In addition, your response stated that the bearing was damaged and was being replaced, so further bearing damage was not of concern. The worker used a brass hammer to remove the bearing, and the pump shaft was not damaged during the bearing removal. Your response noted that the bearing removal methodology used has been discussed with the pump manufacturer and that they concurred that the methology was appropriate in this instance.

While we do not consider a brass hammer to be a normally acceptable "equivalent" substitute for a bearing puller, the fact that the bearing was already damaged indicates that the method used to remove the bearing was acceptable in this instance and that this decision was within the skill of the craft. In view of this, we have concluded that there was no violation of Technical Specification 6.8.1.a.

Sincerely,

Stall Kall John M. Montgomery

Deputy Regional Administrator

cc: Wclf Creek Nuclear Operating Corp. ATTN: Otto Maynard, Director Plant Operations P.O. Box 411 Burlington, Kansas 66839

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Wolf Creek Nuclear Operating Corporation

Shaw, Pittman, Potts & Trowbridge ATTN: Jay Silberg, Esq. 2300 M Street, NW Washington, D.C. 20037

Public Service Commission ATTN: C. John Renken Policy & Federal Department P.O. Box 360 Jefferson City, Missouri 65102

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

Wolf Creek Nuclear Operating Corp. ATTN: Kevin J. Moles Manager Regulatory Services P.O. Box 411 Burlington, Kansas 66839

Kansas Corporation Commission ATTN: Robert Elliot, Chief Engineer Utilities Division 1500 SW Arrowhead Rd. Topeka, Kansas 66604-4027

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 66839-1798

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 Wolf Creek Nuclear Operating -3-Corporation

Kansas Department of Health and Environment ATTN: Robert Eye, General Counsel LSOB, 9th Floor 900 SW Jackson Topeka, Kansas 66612

Wolf Creek Nuclear Operating Corporation

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MAR 2 6 1993

bcc to DMB (IE01)

bcc distrib. by RIV: J. L. Milhoan Section Chief (DRP/A) DRSS-FIPS RIV File MIS System Project Engineer (DRP/A) DRS

Resident Inspector DRP Section Chief (RIII, DRP/3C) SRI, Callaway, RIII Lisa Shea, RM/ALF, MS: MNBB 4503 Section Chief (DRP/TSS)

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Wolf Creek Nuclear Operating -4-Corporation

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RIV:C:DRP/A	D/:DRP	DRAAM	
WDJohnson;df	ABBeach	JMMøntgomery	
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Bart D. Withers President and Chief Executive Officer March 11, 19MAR 15 1993

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

> References: 1) Letter dated February 1, 1993 from A. B. Beach, NRC, to B. D. Withers, WCNOC 2) Letter NA 93-0055, dated March 2, 1993, from R. C. Hagan, WCNOC, to NRC Subject: Docket No. 50-482: Response to Violation 482/9232-01

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOC) response to Violation 482/9232-01 which was documented in Reference 1. Violation 482/9232-01 involved the failure to follow written work instructions during the removal of Spent Fuel Cooling Pump "A" inboard bearing. In Reference 2, WCNOC requested and was granted an extension until March 15, 1993. This was based upon a telecon between Mr. Chris Kennedy of Region IV and Mr. Terry L. Riley, on March 2, 1993.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4000 or Mr. Kevin J. Moles of my staff at extension 4565.

Very truly yours,

Bart D. Withers President and Chief Executive Officer

BDW/jan

Attachment

cc: J. L. Milhoan (NRC), w/a
G. A. Pick (NRC), w/a
W. D. Reckley (NRC), w/a
W. D. Johnson (NRC), w/a

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P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-6831 An Equal Opportunity Employer M/F/HC/VET Attachment to WM 93-0043 Page 1 of 3

Reply to Notice of Violation

Violation 9232-01: Pailure to Properly Implement Procedure

Failure to follow instructions. During the implementation of Work Request 05923-92 the mechanic used a hammer instead of a bearing puller to remove the inboard bearing from the shaft of Spent Fuel Pool Cooling Pump "A".

Finding:

"Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978. Regulatory Guide 1.33, Appendix "A", Item 9.a, states that maintenance affecting the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Step 2.16 of the work instructions for Work Request 05923-92 states that the inboard bearing of the spent fuel pool cooling pump will be removed using a bearing puller or equivalent.

Contrary to the above, on December 8, 1992, while implementing Work Request 05923-92, licensee personnel used a hammer to remove the inboard bearing from the shaft of Spent Fuel Pool Cooling Pump A instead of a bearing puller."

Admission Or Denial Of The Alleged Violation:

WCNOC denies the alleged violation.

Reason For Denial Of The Violation:

The work instruction for Work Request 05923-92 stated:

2.16 RWO Remove inboard bearing (168A) using a bearing puller or equivalent. NEVER use a hammer to drive shaft through bearing!

The step allowed the craft to use experience and training to select an appropriate tool to remove the bearing. The NRC inspector had initially read this step to say that a hammer could never be used. This was clarified with the inspector during followup discussions. The step would have stated: "NEVER use a hammer", incread of "NEVER use a hammer to drive the shaft through the bearing:", if a hammer was an unacceptable tool for use in removing the bearing. Attachment to WM 93-0043 Page 2 of 3

Performance Improvement Request (PIR) MA 93-0008 was initiated to investigate the inspector's concern, identify the root cause (if any) and to recommend corrective actions for his concern. Based on the investigation the following was determined:

- The bearing was damaged during normal pump operation and further bearing damage was not of concern. The bearing removal and replacement was the subject of the work instructions.
- 2) The work instructions stated to "Remove inboard bearing (168A) using a bearing puller or equivalent. NEVER use a hammer to drive shaft through bearing!" This instruction prohibits the worker from using a hammer to drive the shaft through the bearing to avoid damaging the shaft. It does not prohibit the use of a hammer to remove an already damaged bearing.
- 3) The worker followed the work instructions and did not use a hammer to drive the shaft through the bearing.
- 4) The worker used a brass hammer to remove the bearing. Thus, there was minimal risk in damaging the shaft.
- 5) The pump shaft was not damaged.
- 6) It is WCNOC's position that the substitution of a hammer in place of a bearing puller was a decision within the skill-of-the-craft, and was an equivalent and acceptable alternative to using a bearing puller for this situation.

Based on the above it was determined that the work instructions were not violated. The worker performed the bearing removal in a manner which was consistent with his knowledge and abilities.

Based on interviews conducted for PIR # MA 93-0008, the following supports the conclusion that the use of a hammer in this case was within the "skill-of-the-craft":

- The Mechanical Maintenance Supervisor and the worker involved believed that the instructions as written allow for the substitute method, and that the method used is within what would be considered, "good craft practice" or "skill-of-the-craft".
- Mechanical Maintenance supervision, and the worker involved are in agreement that the method used was appropriate for the circumstances.
- 3) Three of the most senior Mechanical Maintenance Engineering instruction writers believe that the instructions were not misinterpreted and that the actions taken by the worker were appropriate.

Attachment to WM 93-0043 Page 3 of 3

4) The methodology used to remove the bearing was discussed with the pump manufacturer and they concurred with the methodology used in this instance.

However, in an effort to prevent future work instruction interpretation concerns the Manager Maintenance and Modifications has issued a memo to all Maintenance Department Personnel clarifying management's expectation regarding:

- 1) Expected level of detail for work instructions.
- 2) Field interpretation of work instructions.
- 3) Using skill-of-the-craft.