

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bar D. Withers
President and
Chief Executive Officer

December 7, 1990

WM 90-0198

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

Reference: 1) Letter dated October 19, 1990 from S. J. Collins,
NRC to B. D. Withers, WCNOG
2) Letter dated November 9, 1990 from S. J. Collins,
NRC to B. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Violation 482/9031-02
and 482/9034-02

Gentlemen:

The Attachment provides Wolf Creek Nuclear Operating Corporation's (WCNOG) combined response to violations 482/9031-02, 482/9034-02 and other requested information. As a result of discussions on November 14, 1990 between Mr. A. T. Howell, NRC and Mr. H. K. Chernoff, WCNOG, concerning the similarities of three NRC requested responses to NRC violations and concerns, it was agreed that WCNOG would provide a combined response to these items.

Reference 1 transmitted violation 482/9031-02 concerning the failure to take adequate corrective action and requested additional information regarding the overall actions to correct the apparent continuing work control problems and an assessment of the effectiveness of the corrective action program at Wolf Creek Generating Station (WCGS). Reference 2 transmitted violation 482/9034-02 concerning the failure of the corrective action program to ensure that hardware failures and nonconforming conditions are evaluated to assure equipment operability. On November 12, 1990, additional information was verbally requested by Mr. A. T. Howell, NRC, concerning WCNOG's previously submitted response to violation 482/9028-01.

901212 0129 901207
PUR A. OCK 05000482
PDC

FEI
111

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff.

Very truly yours,



Bart D. Withers
President and
Chief Executive Officer

BDW/jra

Attachment

cc: A. T. Howell (NRC), w/a
R. D. Martin (NRC), w/a
D. V. Pickett (NRC), w/a
M. E. Skow (NRC), w/a

Violation (482/9031-02): Failure to Take Adequate Corrective Action

Finding: Criterion XVI of 10 CFR Part 50, Appendix B, "Corrective Actions," requires, in part, that measures shall assure that conditions adverse to quality are promptly identified and corrected. The licensee's quality assurance Procedure QAP 16.1, "Corrective Action for QA Program Breakdowns," Revision 3, paragraph 6, states that corrective action controls, as established in this procedure, shall assure that significant conditions adverse to quality are promptly identified, reported, and corrected to preclude recurrence as required by WCNOG Corporate Quality Manual, KGP-1210 and ADM 01-033. Procedure KGP-1210, Revision 3, "Programmatic Deficiency Reporting," Section 6.1 requires a programmatic deficiency report be written "or a significant deviation from expected plant performance.

1. Contrary to the above, on May 16, 1990, the licensee failed to initiate a programmatic deficiency report following a test of the main generator voltage regulator that produced an unexpected response, including alarms and low voltage conditions on the safety-related busses.
2. Contrary to the above, the licensee did not perform, in a timely fashion, portions of the corrective action for the May 16, 1990, test, specifically relevant to the control room crews, until approximately 3 weeks after our inspector questioned the performance of the test.

Violation (482/9034-02): Failure to Evaluate Hardware Failures and Nonconformances to Assure Equipment Operability

Finding: 10 CFR 50, Appendix B, Criterion XVI, states, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Wolf Creek Generating Station Quality Assurance Procedure QAP 16.1, "Corrective Action for QA Breakdowns," Revision 3, paragraph 6, states, in part, that corrective action controls, as established in this procedure, shall assure that significant conditions adverse to quality are promptly identified, reported, and corrected.

Contrary to the above, the licensee's corrective action program did not assure that a nonconforming condition potentially affecting the operability of the turbine-driven auxiliary feed pump (TDAFP) was promptly reported and corrected. This condition existed from November 2, 1989, to October 1, 1990, before it was corrected and subsequently reported to the NRC.

Request For Additional Information (482/9028-01): Watchstander With Inactive License

On November 12, 1990, Mr. A. T. Howell, NRC, verbally requested WCNOC to provide additional information on violation 482/9028-01. The information requested concerned the reason for not initiating a corrective action document when it was identified by Control Room personnel when an individual assumed the supervising operator watch without having performed the required proficiency watches.

Reason For Violation:

(482/9031-02): The reason for the violation was the failure of Control Room personnel to recognize that the main generator voltage regulator adjustment and subsequent undervoltage condition constituted a significant condition adverse to quality. On May 16, 1990, while performing the main generator voltage regulator adjustment various alarms were received indicating an undervoltage condition of the plant electrical busses. The Control Room operators followed the appropriate alarm responses and terminated the regulator adjustment. The actions taken by the operators prevented the loss of any electrical bus or a main generator trip. The actions taken were noted in the Shift Supervisor log and reported to Operations Management. Since the adjustment did not result in the loss of an electrical bus or a trip of the main generator Control Room personnel initially determined that no corrective action document was required to be generated. Additionally, discussions with the operating crews were not held until investigation into the recent events related to inadequate work control practices was conducted and the appropriate corrective actions determined.

(482/9034-02): The reason for the violation was the failure of licensed and nonlicensed personnel to evaluate the seismic qualifications of a DC control cable that connects to the electro-hydraulic valve actuator on the Turbine Driven Auxiliary Feedwater Pump. On November 2, 1989 Control Room personnel made an operability decision with the information available and the associated work request was assigned a lower priority. Again on May 10, 1990 while reviewing the environmental qualifications, nonlicensed personnel failed to identify a seismic concern on the DC control cable.

RAI(482/9028-01): At the time of this event, the individual was relieved by a qualified on-shift supervising operator. Minimum shift crew composition in accordance with Technical Specification Table 5.2-1 was satisfied. As a result of the Manager Operations requiring Shift Supervisors to track the status of proficiency watches, it was identified by Control Room personnel that the individual did not have the required proficiency watches. Since minimum shift crew composition was satisfied and actions had been previously initiated by the Manager Operations, it was initially determined that this event was not significant and that no corrective action document needed to be generated.

Corrective Steps:

The similarities associated with the two violations and request for additional information involve the identification of significant conditions adverse to quality and timeliness of corrective actions. The discussions below provide the corrective steps that have been taken to enhance the work controls program and the corrective action program.

Work Controls Program. As a result of the main generator voltage regulator adjustment, the nonconforming condition potentially affecting the operability of the turbine-driven auxiliary feedwater pump and other recent events, WCNOG has implemented several enhancements to the work controls program. These enhancements are discussed below.

1. Operations and Maintenance Management have determined that work on equipment in service is to be performed under procedural controls. Under special circumstance the requirement to have a procedure for the work activity may be waived with the approval of both the Manager Operations and Manager Maintenance and Modifications. Procedure ADM 08-201, "Control of Maintenance and Modifications", has been revised to reflect the above practice. Procedures are currently being developed for preventative maintenance activities and are to be in place prior to performance of the activity. For corrective maintenance activities on equipment in service, procedures are developed as the need arises. Proceduralizing work activities on in service equipment ensures that appropriate reviews are performed to determine the effect of activities on plant operation and safety-related equipment.
2. An engineering screening/review of Work Requests has been incorporated into the work controls program to assess the identified nonconformance and its effect on the ability of a component or associated system component to perform its Safety Design Basis Function. The backlog of open Corrective Work Requests was reviewed and no additional design basis problems were identified. Procedure ADM 05-001, "Work Request Review" was developed to provide the details for performing this review. This design basis engineering review of the nonconformance may lead to further Control Room review of the initial operability determination and minimizes the potential for having inoperable safety-related equipment in the plant without being in the appropriate Technical Specification action statement.
3. Procedure ADM 01-057, "Work Request" was revised to provide detailed guidelines for the performance of troubleshooting activities. Troubleshooting activities that are associated with plant systems or are significant to plant operation require the initiation of a Work Request and notifying the Shift Supervisor prior to commencement of the activity. Documentation of the troubleshooting activity is accomplished by step by step instructions delineating a troubleshooting sequence or a composition of a step by step chronological log of the troubleshooting sequence as it progresses or a combination of both on the Troubleshooting Activity Sheet. These guidelines provide a uniform approach to troubleshooting activities.

Corrective Action Program. WCNOC corrective action program encompasses procedures for identifying hardware nonconformances and programmatic and implementation problems. WCNOC utilizes a company wide procedure, KGP-1210, "Programmatic Deficiency Reporting", to provide a uniform approach to documenting analyzing and responding to significant conditions adverse to quality of a programmatic or implementation nature. In June, 1990, the Quality Assurance organization conducted an audit of the corrective action program to verify the effectiveness of the program. Although there was room for performance improvements in the implementation of the corrective action program the overall program was considered to be adequate. Discussed below are enhancements that are being implemented to improve the corrective action program and to provide prompt notification of problems to the appropriate level of management.

1. On October 4, 1990, the Plant Manager issued, to all station personnel, a letter discussing the importance of identification of problems, mistakes, near misses, or unusual plant occurrences so that appropriate root cause analysis and corrective action to prevent recurrence can be initiated. Plant Management is continuing to review the Control Room and Shift Supervisor Logs with an increased awareness to question identified problems for significance.
2. In January 1990, procedure ADM 02-112, "Operations Event Reports" was established as a mechanism by which Control Room personnel can report events, conditions or occurrences which should be made known to WCGS management. On November 20, 1990, Operations Management provided additional guidance to Control Room personnel concerning the initiation of Operations Event Reports (OERs). This guidance has been reflected in a change to ADM 02-112. Control Room personnel are to generate OERs and Operations Management determines if additional corrective measures are required which may include review of the event by the Plant Safety Review Committee.
3. Procedure KGP-1210 has been revised to require a formal independent review of proposed corrective action and a review of the effectiveness of the corrective actions taken. This independent review is accomplished by a cognizant individual not directly responsible for the subject activity. The procedure revision additionally requires organizations to establish and track a follow-up date when appropriate to formally review the effectiveness of corrective actions taken.

Date When Full Compliance Will Be Achieved:

As described above, WCNOC has implemented several enhancements to provide increased cognizance and control of work activities in the plant. In addition enhancements to the corrective action program have been implemented to ensure conditions are identified to the appropriate level of management and properly documented, evaluated and corrected. Full compliance has been achieved.