

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Otto L. Maynard
Vice President Plant Operations

May 13, 1994

WO 94-0057

U. S. Nuclear Regulatory Commission
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Reference: Letter dated April 15, 1994, from T. P. Gwynn, NRC,
to N. S. Carns, WC'OC
Subject: Docket No. 50-482: Reply to Notice of Violation
482/9402-01

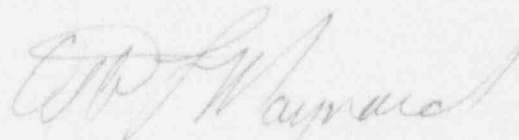
Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOC) Reply to Notice of Violation 482/9402-01 which was documented in the Reference (NRC Inspection Report 50-482/94-02).

Violation 482/9402-01 concerned WCNOC's failure to correctly update controlled drawings to reflect changes in locked valve positions. WCNOC understands the importance of maintaining accurate and current drawings available in the Control Room for use by Licensed Personnel. Therefore, WCNOC has revised the applicable drawings and procedure to meet the needs of the Operations staff.

If you have any questions regarding these matters please contact me at (316) 364-8831 extension 4450 or Mr. K. J. Moles at extension 4565.

Very truly yours,



Otto L. Maynard

OLM/jad

Attachments

cc: L. J. Callan (NRC), w/a
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Reply to Notice of Violation 482/9402-01

Violation 482/9402-01: Failure to revise plant drawings to reflect changes in locked valve positions.

"During an NRC inspection conducted February 14-24, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Criterion V, "Instructions, Procedures, and Drawings," of Appendix B to 10 CFR Part 50 states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings." Wolf Creek Procedure ADM 02-102, "Control of Locked Component Status," Revision 27, Section 5.0, requires that drawings (P&IDs) be revised to reflect changes to locked valves, breakers, or component lists.

Contrary to the above, on February 22, 1994, Drawings M-12EG03(Q), "Component Cooling Water System, R00," and M-12BL01(Q), "Reactor Makeup Water System, R04," had not been revised since July 29, 1993, to reflect changes to the locked valve list for Valves EG-V089, and BL-V005, respectively. This discrepancy was identified in Performance Improvement Request 93-1203, dated October 27, 1993."

Admission of Violation:

WCNOC acknowledges and agrees that a violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," occurred when WCNOC personnel failed to revise drawings M-12EG03(Q) and M-12BL01(Q) to reflect changes in the locked valve status for valves EG-V089 and BL-V005, respectively.

Reason for Violation:

At WCNOC there are two types of documents that indicate the position of locked valves. The first type of document is the Piping and Instrumentation Diagrams (P&IDs). The second type of document is procedure ADM 02-102, "Control of Locked Component Status." It is WCNOC's policy that ADM 02-102 is the controlling document. Further, when conflicts between the various documents are identified the position contained in ADM 02-102 is the required position for the component.

The root cause of this violation has been determined to be a cognitive decision to allow the discrepancies between the P&IDs and ADM 02-102 to exist. However, the presence of conflicting information did not result in failure to correctly operate the plant, because the Plant Operators used ADM 02-102 to determine the correct position for all locked components. In addition, the P&IDs clearly note that ADM 02-102 is the governing plant document in this case.

Corrective Steps Taken and Results Achieved:

A survey was conducted in Operations to determine what types of locked valve designations were needed on P&IDs. It was determined that the designations were not needed on the P&IDs. Therefore, the P&IDs have been updated to remove the locked valve designations.

Procedure ADM 02-102 has been revised. This revision removes the requirement to update P&IDs to reflect the status of locked components.

Corrective Steps That Will be Taken to Avoid Further Violations:

The corrective actions described above are considered appropriate and sufficient to avoid further violations. Therefore, all corrective actions are completed and WCNOG is in full compliance with 10 CFR Part 50, Appendix B, Criterion V.

Date When Full Compliance Will be Achieved:

All corrective actions were completed by May 13, 1994.

Actual or Potential Consequences of This Violation:

WCNOG recognizes its responsibility to establish and maintain adequate procedures, instructions, and drawings. Further, WCNOG recognizes that failure to establish and maintain adequate procedures, instructions, and drawings could result in a potentially unsafe operating condition. However, in this case, no unsafe operating condition resulted because WCNOG personnel used ADM 02-102 to determine the correct status of the locked components.

Wolf Creek Nuclear Operating Corporation's Response to
NRC Request for Supplemental Information
Contained in the Cover Letter of
Inspection Report 50-482/94-02

Per the reference, the NRC requested WCNOG address the apparent lack of timely management attention for this concern until the NRC addressed the issue. Performance Improvement Request (PIR) 93-1203 addressed tagging issues associated with the locked valve list. The evaluation noted that drawings (P&IDs) did not always correctly indicate locked valves and went on to state that engineering was aware of this and eventually will correct the drawings. This statement was not challenged during the effectiveness followup. The NRC determined that engineering had not established measures to correct the drawings (P&IDs). The corrective action program identified this particular issue, but based on information available at the time, a cognitive decision was made to allow the condition to exist. This decision was based on discussions between Plant Operations and Engineering where it was determined the drawing discrepancies did not represent a problem to the safe operation of the plant, since ADM 02-102 "Control of Locked Component Status" was the controlling document. This fact is clearly noted on the associated plant drawings. The appropriate individuals involved in the referenced PIR have been counseled as to management's expectations to resolve issues in a timely manner. Resolution can be achieved in various ways including changing the requirements if the requirements have little or no safety significance. However, accepting a problem with no corrective action plan to resolve it is unacceptable.