

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Operations

March 4, 1991

NO 91-0072

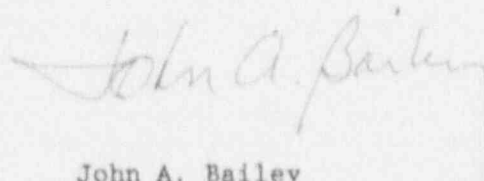
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Subject: Docket No. 50-482: Licensee Event Report 91-003-00

Gentlemen:

The attached Licensee Event Report (LER) is being submitted pursuant to 10 CFR 50.73 (a) (2) (i) concerning a Technical Specification violation.

Very truly yours,



John A. Bailey
Vice President
Operations

JAB/aem

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

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Wolf Creek Generating Station DOCKET NUMBER (2) 05000482 PAGE (3) 1 OF 13

TITLE (4) Technical Specification Violation - Failure To Perform ASME Section XI Required Visual Inspection Of ASME Code Class 2 Piping

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
02	01	1991	1991	003		03	04	1991			050000
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 50. (Check one or more of the following) (11):											

OPERATING MODE (9)	1	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)	0910	20.405(a)(1)(i)	50.38(a)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.38(a)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 308A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(vii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(vii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)
 NAME Merlin G. Williams - Manager Plant Support TELEPHONE NUMBER 31163641-1818311

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)
 YES (If yes, complete EXPECTED SUBMISSION DATE) NO
 EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single space typewritten lines) (16)

On February 1, 1991, it was discovered that an ASME Code Class 2 portion of the Fuel Pool Cooling and Cleanup System was not included in the procedure for the ASME Section XI required visual inspection. The failure to examine these lines is not in accordance with Technical Specification 4.0.5. Performance of valve leak checks and local leak rate tests have indicated that this piping would have met the criteria required by ASME Section XI for a visual examination of ASME Code Class 2 piping.

This event was the result of a personnel error during procedural development of the surveillance procedure. A random review of surveillance procedures covering a wide variety of plant systems was conducted to ensure that all ASME Code Class 1, 2, and 3 components were included. No similar situations were found during this review. Surveillance procedure STS PE-048C, "Refueling Pool Skimmer System Pressure Test", will be revised to incorporate the ASME Code Class 2 piping by May 1, 1991. Also, the ASME Section XI visual examination on this piping will be performed during Refuel V.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Wolf Creek Generating Station	DOCKET NUMBER (2) 0 5 0 0 0 4 8 2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 1	— 0 0 3	— 0 0	0 2	OF 0 3	

TEXT (if more space is required, use additional NRC Form 366A's) (17)

INTRODUCTION

On February 1, 1991, it was discovered that an ASME Code Class 2 portion of the Fuel Pool Cooling and Cleanup System [DA] was not included in the procedure for the required visual inspection. The failure to visually inspect these lines is not in accordance with Technical Specification 4.0.5, since the requirements of ASME Section XI were not satisfied for this piping. Therefore, this occurrence is being reported pursuant to 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

DESCRIPTION OF EVENT

Technical Specification 4.0.5 requires, in part, that inservice inspection and testing of ASME Code Class 1, 2, and 3 components be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda.

On February 1, 1991, during the revision process for procedure STS PE-048C, "Refueling Pool Skimmer System Pressure Test", it was discovered that an ASME Code Class 2 portion of piping on either side of containment penetration P-54 in the Fuel Pool Cooling and Cleanup System was not included in the procedure for the required visual examination. The subject piping is a six inch diameter portion of the return line from the refueling pool to the fuel pool cooling loop.

The requirement to perform a visual examination comes from the Inservice Inspection (ISI) Program Plans as required by ASME Section XI. This visual examination is required to be performed every inspection period (40 months) and is conducted to locate evidence of leakage for pressure retaining components with or without Leakage Collection Systems. A review of past tests did not identify the piping as being tested in the first inspection period (September 3, 1985 to January 3, 1989) nor was the subject piping found to have been inspected by other ISI pressure tests.

On November 22, 1986, a leak check was performed at 15 psig (normal operating pressure) on the isolation valves on either side of penetration P-54, ECV087 and ECV088 [DA-ISV]. No leakage was identified by this leak check. However, this leak check was not performed as a visual examination and was not performed by personnel qualified to perform the subject visual examination. Also, a local leak rate test (LLRT) is performed at 48.6 psig on this piping every 24 months. Past performances of the LLRTs on containment penetration P-54 did not show the presence of leakage. The last LLRT on containment penetration P-54 was performed in March, 1990.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1): Wolf Creek Generating Station	DOCK T NUMBER (2): 0 5 0 0 0 4 8 2 9 1	LER NUMBER (6):			PAGE (3):		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (if more space is required, use additional NRC Form 366A's) (17)

Although there has not been a visual examination performed in accordance with ASME Section XI, the leak check performed on valves ECV087 and ECV088 at the past LLRTs have indicated that this piping would have met the criteria required by ASME Section XI for a visual examination of ASME Code Class 2 piping.

ROOT CAUSE AND CORRECTIVE ACTIONS

This event was the result of a personnel error during procedural development of the surveillance procedure. A random review of surveillance procedures covering a wide variety of plant systems was conducted to ensure that all ASME Code Class 1, 2, and 3 components were included. No similar situations were found during this review. Surveillance procedure STS PE-048C, "Refueling Pool Skimmer System Pressure Test", will be revised to incorporate the ASME Code Class 2 piping by May 1, 1991.

Since the normal operation of the subject line is when the refueling pool is filled for the refueling process, this line would be tested in Mode 5, Cold Shutdown, or Mode 6, Refueling, with the refueling pool filled. A pressure test could be performed on this piping using a Hydro pump while the system is not in service to satisfy the ASME code requirements. However this would require containment entry and unnecessary exposure to plant personnel. Therefore, the ASME Section XI visual examination on this piping will be performed by the end of Refuel V.

ADDITIONAL INFORMATION

During the time period covered in this report, the unit operated in all modes of operation from Mode 6, Refueling, to Mode 1, Power Operation.

Performance of valve leak checks and local leak rate tests have indicated that this piping would have met the criteria required by ASME Section XI for a visual examination of ASME Code Class 2 piping. Therefore, there was no threat to the health and safety of site personnel nor the public.

There have been no previous similar occurrences.