

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Otto L. Maynard  
Vice President Plant Operations

September 2, 1994

WO 94-0122

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 94-007-00

Gentlemen:

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

Very truly yours,



Otto L. Maynard

OLM/jad

Attachment

cc: L. J. Callan (NRC), w/a  
D. N. Graves (NRC), w/a  
W. D. Reckley (NRC), w/a  
J. F. Ringwald (NRC), w/a

JEH

## LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  
WOLF CREEK GENERATING STATIONDOCKET NUMBER (2)  
05000482PAGE (3)  
1 OF 4

TITLE (4)

Failure to Perform Emergency Diesel Generator Fast Load Test

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
1	24	94	94	007	00	09	02	94	WCNOC	05000482
OPERATING			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
1			20.402(b)			20.405(c)			50.73(a)(2)(iv)	73.71(b)
POWER			20.405(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)	73.71(c)
97%			20.405(a)(1)(ii)			50.36(c)(2)			50.73(a)(2)(vii)	OTHER
			20.405(a)(1)(iii)		X	50.73(a)(2)(i)			50.73(a)(2)(viii)(A)	
			20.405(a)(1)(iv)			50.73(a)(2)(ii)			50.73(a)(2)(viii)(B)	
			20.405(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME  
Richard D. Flannigan  
Manager Regulatory ServicesTELEPHONE NUMBER (Include Area Code)  
316-364-4117

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
N/A									

SUPPLEMENTAL REPORT EXPECTED (14)

YES	NO	EXPECTED	MONTH	DAY	YEAR
(If yes, completed EXPECTED SUBMISSION DATE)	X				

## ABSTRACT:

On January 21, 1994, during the performance of surveillance test procedure STS KJ-005A, Revision 20, "Manual/ Auto Start, Synchronization, and Loading of Emergency Diesel Generator NE01" Wolf Creek Nuclear Operating Corporation Operation's personnel incorrectly marked step 5.2.10.2 as not-applicable. This step involves a requirement to fast load the "A" Emergency Diesel Generator. The performance of a fast load test is required once every 184 days by Technical Specification 4.8.1.1.2f (programmatically required every January and July). The test had been scheduled to meet the requirements of Technical Specification 4.8.1.1.2f.

The root cause of this event is cognitive personnel error. Contributing factors include the time at which the test was performed (i.e., during shift turnover) and that step 5.2.10.2 of procedure STS KJ-005A did not clearly delineate the requirements of Technical Specification 4.8.1.1.2f.

Corrective actions included the revision of procedures STS KJ-005A and STS KJ-005B to clearly delineate the requirements of Technical Specification 4.8.1.1.2f, and the placement of Performance Improvement Request 94-1281 in the Operations Required Reading Program.

**LICENSEE EVENT REPORT (LER)**  
TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Wolf Creek Generating Station	05000 482	94	007	00	2 OF 4

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

PLANT CONDITIONS AT THE TIME OF EVENT

Plant Operational Condition: Mode 1  
Plant Power Level: 97%

BASIS FOR REPORTABILITY:

Technical Specification 4.8.1.1.2f requires each emergency diesel generator to be fast load tested from ambient conditions using one of the signals specified in Technical Specification 4.8.1.1.2.a4 and accelerated to at least 514 rpm in less than or equal to 12 seconds. The generator voltage and frequency shall be 4160 + 160-420 volts and 60 ± 1.2 Hz within 12 seconds after the start signal.

On January 21, 1994, Wolf Creek Nuclear Operating Corporation (WCNOC) performed surveillance test procedure STS KJ-005A, Revision 20, "Manual/ Auto Start, Synchronization, and Loading of Emergency Diesel Generator NE01." However, the test performer incorrectly marked step 5.2.10.2, which should have implemented the fast load requirements of the Technical Specification 4.8.1.1.2f, as not applicable. This incident is, therefore, reportable under 10 CFR 50.73(a)(2)(i)(B) as a violation of the Plant Technical Specifications.

DESCRIPTION OF EVENT

Procedure STS KJ-005A, Revision 20, "Manual/ Auto Start, Synchronization, and Loading of Emergency Diesel Generator NE01," was scheduled for and performed on January 21, 1994. The test had been scheduled to meet both the post maintenance testing requirements and the testing requirements of Technical Specification 4.8.1.1.2f. Technical Specification 4.8.1.1.2f in part establishes the fast load testing requirements for the emergency diesel generators. WCNOC Operation's personnel incorrectly marked step 5.2.10.2 as not-applicable.

The failure to correctly perform the testing requirement specified in Technical Specification 4.8.1.1.2f was discovered by WCNOC Operation's personnel on August 3, 1994, during the performance of a Self Assessment of the WCNOC Surveillance Testing Program. Upon identification of the event, the Self Assessment Team issued Performance Improvement Request (PIR) 94-1281 to document the concern and to ensure that the root cause was identified and corrective actions were implemented. Additionally, the Self Assessment Team verified that the July, 1994, performance of STS KJ-005A was correctly implemented and that no current emergency diesel generator operability concerns existed.

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			YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Wolf Creek Generating Station		05000				
		482	94	007	00	3 OF 4

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

ROOT CAUSE AND CORRECTIVE ACTIONS

Root Cause:

The root cause of the failure to meet the testing requirement of Technical Specification 4.8.1.1.2f is cognitive personnel error. Both operating crews involved with the surveillance were interviewed, but due to the time involved, i.e., greater than 6 months, were unable to recall specific details which could have determined a more specific root cause. A review of surveillances STS KJ-005A and STS KJ-005B from 1988 to the present revealed no other occurrences of this nature.

Contributing factors include:

Procedure STS KJ-005A, Step 5.2.10.2 did not clearly delineate the requirements of Technical Specification 4.8.1.1.2f (i.e., the January and July performance of this test is mandatory to meet the requirements of Technical Specification 4.8.1.1.2f). The failure to clearly delineate the requirements of Technical Specification 4.8.1.1.2f represents a "Information Presentation Deficiency."

The test was being performed at shift turnover. This may have distracted the test performer from being able to devote his full attention to the performance of the testing activity. Additionally, the personnel responsible for performing the test changed during shift turnover.

The individual assigned to perform the surveillance test may have believed that the test was being performed to meet post maintenance testing requirements only, and the performance of step 5.2.10.2 was perceived as not required and was subsequently marked not-applicable.

Corrective Actions:

Procedure STS KJ-005A and STS KS-005B were revised to clarify the testing requirements of Technical Specification 4.8.1.1.2f.

PIR 94-1281 was placed in Operations Required Reading Program to inform all licensed Operation's personnel of the human error aspects of the missed surveillance and the need to minimize testing activities during shift turnovers.

Due to the length of time since this event additional corrective actions, such as personnel counseling, were considered to be unwarranted.

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Wolf Creek Generating Station	05000 482	94	007	00	4 OF 4

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SAFETY ANALYSIS:

The health and safety of the public was assured because the "B" emergency diesel generator was available; the plant conditions did not require the "A" emergency diesel generator to operate; and the emergency diesel generator was correctly tested and returned to service in accordance with the normal testing program prior to the time of discovery.

OTHER SIMILAR OCCURRENCES

None.