

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Otto L. Maynard
Vice President Plant Operations

August 25, 1995

WO 95-0127

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

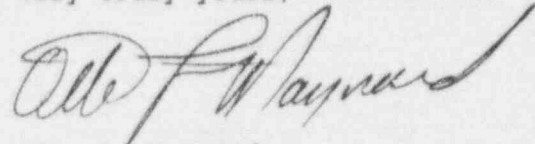
Subject: Docket No. 50-482: Licensee Event Report 95-004-00

Gentlemen:

The attached voluntary Licensee Event Report (LER) is being submitted concerning a failure to comply with license condition 2.C(1) of Facility Operating License NPF-42.

If you should have any questions regarding this submittal, please contact me at (316) 354-8831, extension 4450, or Mr. William M. Lindsay at extension 8760.

Very truly yours,



Otto L. Maynard

OLM/jad

Attachment

cc: L. J. Callan (NRC), w/a
D. F. Kirsch (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

9508280368 950825
PDR ADDCK 05000482
S PDR

P.O. Box 411 / Burlington, KS 66839 / Phone: (316) 364-8831

An Equal Opportunity Employer M/F/HC/VET

1522
||

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 PAPERWORD REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) WOLF CREEK GENERATING STATION	DOCKET NUMBER (2) 05000482	PAGE (3) 1 OF 5
---	--------------------------------------	---------------------------

TITLE (4)
Failure To Comply With License Condition 2(c) Due A Failed Pump

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
7	28	95	95	004	00	08	25	95	FACILITY NAME	DOCKET NUMBER

OPERATING Mode 1	THIS RE. IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)																								
POWER 100%	<table border="1" style="width:100%"> <tr> <td>20.402(b)</td> <td>20.405(c)</td> <td>50.73(a)(2)(iv)</td> <td>73.71(b)</td> </tr> <tr> <td>20.405(a)(1)(i)</td> <td>50.36(c)(1)</td> <td>50.73(a)(2)(v)</td> <td>73.71(c)</td> </tr> <tr> <td>20.405(a)(1)(ii)</td> <td>50.36(c)(2)</td> <td>50.73(a)(2)(vii)</td> <td>X OTHER</td> </tr> <tr> <td>20.405(a)(1)(iii)</td> <td>50.73(a)(2)(i)</td> <td>50.73(a)(2)(viii)(A)</td> <td>License Condition 2(f)</td> </tr> <tr> <td>20.405(a)(1)(iv)</td> <td>50.73(a)(2)(ii)</td> <td>50.73(a)(2)(viii)(B)</td> <td></td> </tr> <tr> <td>20.405(a)(1)(v)</td> <td>50.73(a)(2)(iii)</td> <td>50.73(a)(2)(x)</td> <td></td> </tr> </table>	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)	20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	X OTHER	20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	License Condition 2(f)	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)	
20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)																						
20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)																						
20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	X OTHER																						
20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	License Condition 2(f)																						
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 William M. Lindsay Manager Performance Assessment	TELEPHONE NUMBER (Include Area Code) 316-364-8760
--	---

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

ABSTRACT:

On July 27, 1995, at approximately 0215 CDT, the ASME Section III, Class 3, lube oil keepwarm pump for emergency diesel generator "A" failed. A qualified ASME Section III, Class 3, replacement pump was unavailable and no replacement parts were available to repair the failed pump.

Wolf Creek Nuclear Operating Corporation (WCNOC) formally requested "enforcement discretion" and an "exigent change" (later changed to an emergency change by the Nuclear Regulatory Commission) to the operating license on July 28, 1995. WCNOC received verbal approval for both requests on July 28, 1995. Formal written approval of the enforcement discretion was received on August 1, 1995, and the emergency license change was received on August 3, 1995. The failed pump was replaced with a non-ASME Section III, Class 3, pump on July 31, 1995, after verbal approval was received. Enforcement discretion does not alleviate the reporting requirements for the time enforcement discretion is in place. Therefore, this report is submitted to cover the time frame between July 31, 1995, to August 3, 1995, in which the non-ASME pump was installed prior to receipt of the formal license amendment.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Wolf Creek Generating Station	05000482	95	004	00	2 OF 5

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

Plant Conditions Prior to the Event:

Mode 1

Reactor Power 100%

"A" Emergency Diesel Generator Lube Oil Keep Warm Pump Out Of Service

"B" Emergency Diesel Generator Out of Service On July 28, 1995, Due To Over Speed Trip

Basis for Reportability:

Facility Operating License, NPF-42, Section 2(F) requires Wolf Creek Nuclear Operating Corporation (WCNOC) to report to the Nuclear Regulatory Commission (NRC), except as otherwise specified in the Technical Specification, all violations of the license. The report must be made within 24 hours, via the emergency notification system, with written followup within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c), (e).

License Condition 2.C(1), Attachment 1, contained in Facility Operating License NPF-42, required that WCNOC install lube oil keepwarm pumps satisfying ASME Section III, Class 3, requirements prior to startup following the first refueling outage.

On July 27, 1995, at approximately 0215 CDT, the ASME Section III, Class 3, lube oil keepwarm pump for emergency diesel generator "A" failed. On July 31, 1995, at approximately 1626 hours CDT, a non-ASME Section III, Class 3, lube oil keepwarm pump was installed and the "A" EDG was declared operable.

On August 3, 1995, the NRC issued license amendment # 88 to the Facility Operating License NPF-42, which deleted license condition 2.C(1), Attachment 1. A written notice of enforcement discretion (NOED 95-06-10) was also issued on August 1, 1995.

Enforcement discretion does not alleviate the reporting requirements for the time enforcement discretion is in place. Therefore, this report is submitted to cover the time frame between July 31, 1995, to August 3, 1995, in which the non-ASME pump was installed prior to receipt of the formal license amendment.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Wolf Creek Generating Station	05000482	95	004	00	3 OF 5

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

Description of Event:

On July 27, 1995, the lube oil keepwarm pump for emergency diesel generator "A" [EK] failed. The lube oil keepwarm pump operates continuously while the diesel engine is in a standby mode of operation. Following the failure of the keepwarm pump, emergency diesel generator "A" was administratively declared inoperable and Technical Specification 3.8.1.1, Action b, was entered. This technical specification requires, in part, that the inoperable emergency diesel generator be returned to operable status within 72 hours or the unit must be placed in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours. The emergency diesel generator was administratively declared inoperable to maximize personnel safety while working on the keepwarm pump. The "A" emergency diesel generator could be maintained operable by periodically starting and running the emergency diesel generator to keep the lube oil temperature within the required temperature band. The oil must be circulated within the keepwarm system in order to maintain the oil in the emergency diesel generator sump in a warm condition to facilitate a quick start of the engine.

On July 27, 1995, the mechanical overspeed trip device on the "B" emergency diesel generator actuated due to a probable governor adjustment problem and the diesel generator was declared inoperable and Technical Specification 3.8.1.1, Action f, was entered. It is important to note that this trip occurred as the "B" emergency diesel was being shutdown. Therefore, at all times prior to the trip the "B" emergency diesel was operable. The "B" emergency diesel generator was started to meet Technical Specification 3.8.1.1, Action b, which requires that with one emergency diesel generator inoperable, the operability of the remaining operable emergency diesel generator must be demonstrated by performing Technical Specification 4.8.1.1.1 within 24 hours. Technical Specification 3.8.1.1, Action f, requires, in part, that one of the two inoperable emergency diesel generators be returned to operable status within 2 hours or the unit must be placed in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours.

The "A" emergency diesel generator was started and operated until the lube oil temperature was returned to the required temperature band. The "A" emergency diesel generator was then declared operable with an isolated ASME Section III, Class 3 keepwarm pump, satisfying the requirements of Technical Specification 3.8.1.1, Action f. The plant remained in Technical Specification 3.8.1.1, Action b, due to the inoperable "B" emergency diesel generator. WCNOG periodically started the "A" emergency diesel generator to maintain its operability by maintaining the lube oil within the required temperature band.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Wolf Creek Generating Station	05000482	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 OF 5
		95	004	00	

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

Previous attempts to obtain an ASME Section III, Class 3, replacement pump or parts had been unsuccessful. The original manufacturers of the pump no longer produced the pump or suitable replacement parts, and a qualified ASME Code replacement was unavailable. WCNOG was in the process of having two keepwarm pumps manufactured under the guidance of Generic Letter 89-09, "ASME Section III Component Replacements," however, these pumps were not going to be available until early 1996.

WCNOG requested enforcement discretion (by letter ET 95-0078) and an exigent license amendment (later changed to an emergency license amendment) (by letter ET 95-0079) to delete license condition 2.C(1), Attachment 1, of the Facility Operating License NPF-42. This license condition required the EDG lube oil keepwarm pump to be ASME Section III, Class 3. Verbal enforcement discretion was granted by the NRC on July 28, 1995.

On July 31, 1995, at approximately 1626 hours CDT, a non-ASME Section III, Class 3, lube oil keepwarm pump was installed and the "A" emergency diesel generator was declared operable. A written notice of enforcement discretion (NOED 95-06-10) was issued on August 1, 1995. On August 3, 1995, the NRC issued emergency license amendment number 88 to the Facility Operating License NPF-42, which deleted license condition 2.C(1), Attachment 1. Therefore, from July 31, 1995, until receipt of the license amendment August 3, 1995, WCNOG did not meet license condition 2.C(1), Attachment 1.

Root Cause and Corrective Actions:

Root Cause:

The root cause of plant's failure to comply with License Condition 2.C(1) was WCNOG's inability to obtain a ASME Section III, Class 3, replacement pump or parts.

Corrective Actions:

WCNOG requested and received "enforcement discretion" on July 28, 1995, to permit the installation of the non-ASME Section III, Class 3 keepwarm pump until an emergency license condition change could be approval by the NRC.

WCNOG installed a non-ASME Section III, Class 3 replacement keepwarm pump, on July 31, 1995.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Wolf Creek Generating Station	05000482	95	004	00	5 OF 5

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

Formal approval of the enforcement discretion was received on August 1, 1995, and approval of the emergency license change was received on August 3, 1995.

During the time that repairs were taking place on the emergency diesel generator all work in the switchyard [FK] was suspended. This action was taken to enhance the reliability of the two independent offsite sources of power required by Technical Specification 3.8.1.1.a. In addition, all work and surveillances associated with the plant's emergency core cooling system and subsystems were suspended.

Safety Significance:

The purpose of the lube oil keepwarm pump is to circulate lube oil through the emergency diesel generator while it is in the standby mode. This provides pre-lubrication to the engine, maintains the lube oil at approximately 120 degrees Fahrenheit, and provides a continuous oil filtration path. Pre-lubrication of the engine components is an economic consideration to reduce unnecessary wear and to ensure the long term performance of the emergency diesel generator. When the emergency diesel generator is in operation, the engine driven lube oil pump circulates the lube oil through the engine and the keepwarm pump is not required. However the keepwarm pump continues to operate providing a secondary filtration path to that provided by the engine driven pump. The keepwarm pump performs no active safety-related function and must only maintain a pressure boundary once the emergency diesel is in operation.

The non-ASME pump installed is designed and manufactured in accordance with an approved quality program. This pump model is seismically qualified and the installed pump was hydrostatically tested, to assure pressure boundary integrity. The non-ASME Section III, Class 3, pump weight and center of gravity is slightly less than the ASME Section III, Class 3, pump, thus seismic qualifications requirements are not affected. Therefore, the pump is capable of surviving a seismic event without loss of pressure boundary.

Therefore, the installation of a non-ASME keepwarm pump will improve the reliability of the emergency diesel generator and will have no adverse effect on the operability of the emergency diesel generator.

Other Previous Occurrences:

None.