

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Neil S. "Buzz" Carns
Chairman, President and
Chief Executive Officer

September 8, 1995

WM 95-0126

U. S. Nuclear Regulatory Commission
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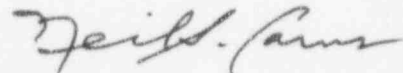
Reference: Letter dated August 8, 1995, from
J. E Dyer, NRC/RIV, to N. S. Carns, WCNOG
(Inspection Report 50-482/95-19)
Subject: Docket No. 50-482: Reply to Notice of
Violation 50-482/9519-01

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG's) reply to Notice of Violation 50-482/9519-01. This violation concerned the potential failure to provide adequate emergency lighting for the operation of Valve EF HV00052.

WCNOG's response to this Notice of Violation is in the attachment to this letter. If you should have any questions regarding this response, please contact me at (316) 364-8831, extension 4000, or Mr. William M. Lindsay at extension 8760.

Very truly yours,



Neil S. Carns

NSC/jad

Attachment

cc: L. J. Callan (NRC), w/a
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D. F. Kirsch (NRC), w/a
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Reply to Notice of Violation 50-482/9519-01

Violation 50-482/9519-01: This violation concerned the potential failure to provide adequate emergency lighting for the operation of Valve EF HV00052.

"Operating License NPF-42, Section 2.C.5(a), requires that the licensee maintain in effect all provisions of the approved fire protection program as described in the safety evaluation report for the facility.

The Wolf Creek Safety Evaluation Report, Section 9.5.1.3, states that the licensee has installed emergency lighting in all areas of the plant needed for operation of safe shutdown equipment.

Contrary to the above, on July 19, 1995, emergency lighting was not available for operation of Valve EF HV-52, the essential service water supply to component cooling water heat exchanger isolation, for safe shutdown of the plant during a control room fire."

Admission of Violation:

Wolf Creek Nuclear Operating Corporation (WCNOC) acknowledges and agrees that a violation of Operating License NPF-42, Section 2.C.5(a) occurred for the above discussed concern.

Reason for Violation:

Root Cause:

WCNOC documented its position on providing emergency lighting, based on the applicable regulatory requirements and guidance, in its Safety Analysis Report. This position included the placement of emergency lighting in all areas permanently manned during an emergency and in all emergency access and egress routes. The Nuclear Regulatory Commission stated its understanding on WCNOC's position on emergency lighting by issuing the WCNOC Safety Evaluation Report (NUREG-0881). NUREG-0881 states that WCNOC has installed emergency lighting in all areas needed for operation of safe shutdown equipment. This statement in NUREG-0881 added the requirement for additional emergency lighting not previously committed to or installed by WCNOC.

WCNOC personnel, at the time NUREG-0881 was issued, did not recognize that emergency lighting in only manned areas was not sufficient to comply with Safety Evaluation Report; nor was this discrepancy discovered by subsequent reviews and inspections. Therefore, the WCNOC emergency lighting requirements, as set forth in the Safety Analysis Report, were not revised to reflect the additional requirements delineated in NUREG-0881.

The root cause of this violation is cognitive personnel error in failing to identify the establishment of the additional emergency lighting requirements and failing to assure the necessary program and procedures were in place to implement the requirements.

Corrective Steps Taken and Results Achieved:

The Manager Operations, as an interim corrective action, directed the issuance of a memorandum to all shift supervisors and supervising operators directing them to ensure that the turbine building and auxiliary building watches carry operable flashlights. In addition, the turnover sheets for the turbine building and auxiliary building watches have a requirement that states that building watches shall carry operable flashlights when on shift. These actions will remain in place until adequate lighting has been verified in all areas of the plant where operator action is required upon evacuation of the control room.

In an effort to immediately substantiate and quantify the magnitude of the concern, Operations conducted a plant walkdown using procedure OFN RP-017, Revision 4, "Control Room Evacuation." This "Quick-Look" walkdown was performed by a licensed reactor operator to determine if adequate illumination existed to perform the actions required by the procedure. The walkdown was performed using normal lighting. All areas, with two minor exceptions, appeared to have satisfactory illumination. Based on the walkdown, the licensed operator initially determined that the operator actions required by procedure OFN RP-017 could be accomplished.

To confirm the accuracy of the initial walkdown, personnel from Operations and Engineering were directed to perform a second walkdown. This walkdown was conducted using an approved test procedure, with the normal and standby lighting turned off, as specified in the NUREG, to ensure the operator actions required by procedure OFN RP-017 could be performed under worst case scenario conditions for lighting. The intent of the walkdown was to document that needed emergency lighting was correctly installed, to optimize the aiming of the installed emergency lights, and to ensure the emergency lights adequately illuminated the areas where operator actions were required by procedure OFN RP-017. The walkdown was completed on September 1, 1995. The walkdown identified the following conditions:

- Six areas were identified where there was not sufficient lighting to allow the operator to accomplish the task required by procedure OFN RP-017 without the use of flashlights which are available in the emergency lockers. Components in these areas are being evaluated to determine their effect on safe shutdown.
- Areas were identified where the emergency lighting needed to be re-aimed for optimal illumination.
- Three areas were identified where emergency lighting malfunctioned during the walkdown. The malfunctioning emergency lights have been repaired.
- Areas were identified where emergency lights existed, but were not previously classified as needed to support procedure OFN RP-017.

Corrective Steps That Will Be Taken To Avoid Further Violations:

Engineering and Operations are evaluating the deficiencies identified during the walkdowns performed by engineering and operations. This evaluation and the resulting corrective actions will be completed by December 15, 1995.

Engineering will verify the correct classification (i.e., lights required to perform safe shutdown actions during a control room evacuation versus lights required for access and egress purposes upon loss on normal lighting) has been assigned to the battery powered lights.

Maintenance planning will revise procedure MPE BA-010, "Preventive Maintenance On Teledyne Emergency Lighting," to incorporate:

- The E-1L electrical drawing aiming requirements.
- The emergency lighting aiming requirements identified during this review process.
- The new lights installed to correct areas where emergency lighting was determined to deficient.
- The emergency lights which were reclassified based on the walkdown results.

These activities will be completed by December 15, 1995.

Date When Full Compliance Will Be Achieved:

Completion of the above discussed actions will ensure that the emergency lighting necessary for safe shut down actions under procedure OFN RP-017 are present, are aimed in a manner to allow the operators to perform the required actions, and are correctly maintained. In the interim, the requirement that the turbine building and auxiliary building watches have and carry operable flashlights when on shift will remain in effect.

Full compliance with the above noted requirements will be obtained when all areas of the plant have emergency lighting necessary to support procedure OFN RP-017. All corrective actions associated with this violation will be completed by December 15, 1995.