

FEB 11 1992

Docket No. STN 50-482  
License No. NPF-42

Wolf Creek Nuclear Operating Corporation  
ATTN: Bart D. Withers  
President and Chief Executive Officer  
P.O. Box 411  
Burlington, Kansas 66839

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-482/91-26

Thank you for your letters, dated December 5, 1991, and February 5, 1992, in response to our letter and Notice of Violation dated November 8, 1991, and our letter dated January 2, 1992. We have no further questions at this time and will review your corrective action during a future inspection.

Sincerely,

*Original Signed By:*  
**A. B. BEACH**

A. Bill Beach, Director  
Division of Reactor Projects

cc:  
Wolf Creek Nuclear Operating Corp.  
ATTN: Otto Maynard, Director  
Plant Operations  
P.O. Box 411  
Burlington, Kansas 66839

Shaw, Pittman, Potts & Trowbridge  
ATTN: Jay Silberg, Esq.  
1800 M Street, NW  
Washington, D.C. 20036

Public Service Commission  
ATTN: Chris R. Rogers, P.E.  
Manager, Electric Department  
P.O. Box 360  
Jefferson City, Missouri 65102

RIV:DRP/D  
WBJones;df  
2/10/92

C:DRP/D  
ATHowell  
2/10/92

D:DRP/B  
ABBeach  
2/11/92

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Wolf Creek Nuclear Operating  
Corporation

-2-

U.S. Nuclear Regulatory Commission  
ATTN: Regional Administrator, Region III  
729 Roosevelt Road  
Glen Ellyn, Illinois 60137

Wolf Creek Nuclear Operating Corp.  
ATTN: Steven G. Wideman  
Supervisor Licensing  
P.O. Box 411  
Burlington, Kansas 66839

Kansas Corporation Commission  
ATTN: Robert Elliot, Chief Engineer  
Utilities Division  
1500 SW Arrowhead Rd.  
Topeka, Kansas 66604-4027

Office of the Governor  
State of Kansas  
Topeka, Kansas 66612

Attorney General  
1st Floor - The Statehouse  
Topeka, Kansas 66612

Chairman, Coffey County Commission  
Coffey County Courthouse  
Burlington, Kansas 66839

Kansas Department of Health  
and Environment  
Bureau of Air Quality & Radiation  
Control  
ATTN: Gerald Allen, Public  
Health Physicist  
Division of Environment  
Forbes Field Building 321  
Topeka, Kansas 66620

Kansas Department of Health and Environment  
ATTN: Robert Eye, General Counsel  
LSOB, 9th Floor  
900 SW Jackson  
Topeka, Kansas 66612

bcc to DMB (IE01)

Wolf Creek Nuclear Operating  
Corporation

-3-

bcc distrib. by RIV:  
R. D. Martin  
Section Chief (DRP/D)  
DRSS-RPEPS  
RIV File  
MIS System  
Project Engineer (DRP/D)  
DRS

Resident Inspector  
DRP  
Section Chief (RIII, DRP/3C)  
SRI, Callaway, RIII  
RSTS Operator  
Lisa Shea, RM/ALF

Wolf Creek Nuclear Operating  
Corporation

-3-

bcc distrib. by RIV:

R. D. Martin

Section Chief (DRP/D)

DRSS-RPEPS

RIV File

MIS System

Project Engineer (DRP/D)

DRS

Resident Inspector

DRP

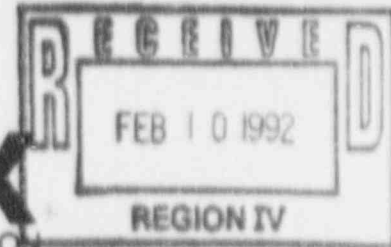
Section Chief (RIII, DRP/3C)

SRI, Callaway, RIII

RSTS Operator

Lisa Shea, RM/ALF

**WOLF CREEK**  
NUCLEAR OPERATING CORPORATION



John A. Bailey  
Vice President  
Operations

February 5, 1992  
NO 92-0045

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

Reference: 1) Letter dated January 2, 1992, from A. B. Beach,  
NRC, to B. D. Withers, WCNOG  
2) Letter WM 91-0172 dated December 5, 1991 from  
B. D. Withers, WCNOG to NRC  
Subject: Docket No. 50-482: Response to Request for Additional  
Information Concerning Violation 482/9126-02 and  
9126-03

Gentlemen:

The purpose of this letter is to provide additional information concerning violation 482/9126-02 and 9126-03 as requested in Reference 1.

Violation 482/9126-02 concerned the failure to restore a damper following a loss of instrument air. Violation 482/9126-03 concerned the failure to control work practices resulting in both trains of two systems being inoperable.

The attachment to this letter provides Wolf Creek Nuclear Operating Corporation's (WCNOG) response to the request for additional information. If you have any questions concerning this matter, please contact me or Mr. S. G. Wideman of my staff.

Very truly yours,

*John A. Bailey*

John A. Bailey  
Vice President  
Operations

JAB/aem

Attachment

cc: A. T. Howell (NRC), w/a  
R. D. Martin (NRC), w/a  
G. A. Pick (NRC), w/a  
W. D. Reckley (NRC), w/a

### Response to Request for Additional Information

Request: With regard to Violation 482/9126-02, we require additional information about the adequacy of Offnormal Procedure OFN 00-019, Revision 8, "Loss of Instrument Air," to identify and respond to this and similar events. We also request that you assess the adequacy of the work controls for the work activity which resulted in isolating the air line.

Response: Procedure OFN 00-019, "Loss of Instrument Air", was generated for responding to a complete loss of the instrument air system. The procedure provides guidance in the event of a loss of air to check the air compressors, ensure the service air system headers is isolated, check the air dryers and stabilize pressurizer level. If the leak is located in a specific instrument air header, the procedure provides the valve number and location for isolation of the header. Additionally, the procedure provides as a reference a list of valves by system and their failure position on a loss of air for assisting in restoration.

Procedure OFN 00-019, was not intended to provide specific actions to be taken when air is lost downstream of branch isolation valves. To try to address every individual loss of air is not appropriate. The procedure has been utilized in the past when a train of air dryers failed or as part of a maintenance activity when the entire instrument header was depressurized. WCNOC believes the OFN 00-019 was adequate for responding to the October 2, 1991 event. However, a document identifying the loads off branch isolation valve would be beneficial to the operators for restoration of portions of the instrument air system during maintenance outages. The Operations Department and system engineer will implement a program for developing a controlled document identifying the loads by the end of April 1992.

WCNOC reviewed the work controls associated with the activity which resulted in isolating the air line and found them to be adequate. During the performance of procedure STS PE-047B, air was found leaking on the regulator for valve KA FV-29. Work Request 04506-91 was initiated on September 27, 1991 to repair the leaking regulator. On October 2, 1991, Instrumentation and Control technician received permission from the Supervising Operator in the Control Room to work on the regulator. The technician indicated to the Control Room that KA FV-29 might close when the work was being performed. When the work was completed and instrument air restored, the Control Room failed to consider the affect upon the containment purge system and failed to utilize OFN 00-019 for restoration.

Request: In general, we found your response to Violation 482/9126-03 to be adequate. In reviewing your corrective actions though, additional information is needed to determine how you will assess the adequacy of maintenance shift turnovers. We also require information on the guidance provided to personnel responsible for reviewing work instructions to determine which activities should be governed by approved procedures and whether the work instructions will be reviewed prior to being implemented again.

Response: The need for effective shift turnovers has been discussed with Maintenance and Modifications Department Supervisors. This discussion stressed the importance of proper communication of work in progress and equipment status during shift turnovers. Electrical and Mechanical Maintenance personnel maintain a daily work log which is used to clarify priorities between shifts and is reviewed daily by Electrical and Mechanical Maintenance Supervisors. Therefore, the adequacy of maintenance shift turnovers is monitored by periodic attendance of supervisors at various shift turnovers and a review of the daily work log.

As identified in Reference 2, an interim checklist was developed for maintenance personnel's use in system restoration to ensure equipment is restored to its proper configuration prior to signing off that the work is complete. For corrective work request packages, this restoration guidance will be provided in ADM 08-206 "Corrective Maintenance" by February 28, 1992. Procedure ADM 08-202, "Planning and Scheduling Preventative Maintenance Tasks" provides specific guidance for determining those preventative work activities that should be governed by approved procedures. During the review of work package instructions as discussed in Reference 2, the guidance in ADM 08-202 or the interim checklist is utilized to strengthen the restoration process in the work instructions or in the development of a procedure. For preventative maintenance activities, the need to strengthen the restoration process in work instructions or the development of a procedure is performed prior to the performance of the activity.