

WOLF CREEK

NUCLEAR OPERATING CORPORATION

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

February 14, 1996

WM 96-0019

U. S. Nuclear Regulatory Commission
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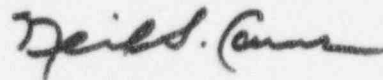
Reference: Letter dated January 18, 1996, from J. E. Dyer,
NRC, to N. S. Carns, WCNOG
Subject: Docket No. 50-482: Response to Violation
482/9525-01

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) reply to Notice of Violation 9525-01 which was documented in the referenced report by the Resident Inspectors. Violation 9525-01 concerned operators failing to properly implement procedure STS EN-100B "Containment Spray Pump B Inservice Pump Test," by using it with numerous steps marked "Not Applicable," such that the procedure no longer accomplished the scope stated in the procedure. This resulted in pump operation that over-pressurized and damaged the suction pressure gauge.

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

Very truly yours,



Neil S. Carns

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PDR ADOCK 05000482
G PDR

NSC/jad

Attachment

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

210024

Reply to Notice of Violation 482/9525-01

Violation 482/9525-01:

"During an NRC inspection conducted on November 19 through December 30, 1995, one violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' (60FR 34381: June 30, 1995), the violation is listed below:

Technical Specification 6.8.1.a states, in part, that written procedures shall be established and implemented covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2.

Regulatory Guide 1.33, Appendix A, Section 3.F, requires procedures for startup, operation, and shutdown of safety-related containment systems.

Procedure STS EN-100B, 'Containment Spray Pump B Inservice Pump Test,' Revision 10, provides procedural guidance for testing Containment Spray Pump B.

Contrary to the above, on December 6, 1995, operators failed to properly implement Procedure STS EN-100B by using it with numerous steps marked not applicable such that the procedure no longer accomplished the scope stated in the procedure, resulting in pump operation that over-pressurized and damaged the suction pressure gauge."

Admission of Violation:

Wolf Creek Nuclear Operating Corporation (WCNOC) acknowledges and agrees that a violation of Wolf Creek Generating Station (WCGS) Technical Specification 6.8.1.a occurred when Control Room personnel failed to properly implement procedure STS EN-100B, Revision 10, "Containment Spray Pump 'B' Inservice Pump Test," by using it with numerous steps marked "Not Applicable."

Reason for Violation:

On December 6, 1995, at approximately 1930 CST, Maintenance personnel completed work on Containment Spray Pump "B" and informed the Control Room that the pump was ready for post-maintenance testing (PMT). Post-maintenance testing required verification that the handswitch started the pump; verification that the pump breaker operated properly; verification that the room cooler started when the pump started; and measurement of the running amperes to the pump motor and room cooler motor.

Control Room personnel used procedure STS EN-100B, to start and stop the pump, and to document the test. The Supervising Operator (SO) reviewed procedure STS EN-100B and marked those steps that he felt were not needed for operating the pump as "Not Applicable." The SO then had the Shift Supervisor (SS) review the steps marked "Not Applicable," using the guidance of WCNOC

Administrative Procedure AP 15C-002, Revision 5, "Procedure Use and Adherence."

The Shift Supervisor reviewed the test, and discussed the test with the Shift Engineer. The Shift Supervisor and Shift Engineer discussed whether a discharge path for the pump was needed. The SS and SO reviewed the Piping and Instrumentation Diagram (P&ID) and determined that the line from the pump discharge through the eductor and back to the pump inlet would provide an adequate recirculation path for a short duration run. Electrical Maintenance personnel were staged at the pump and room cooler breakers to obtain running amps in order to limit the time the pump ran. Control Room personnel determined that the pump run would take approximately thirty seconds to obtain the information required.

Control Room personnel also determined that it was not necessary to take the Refueling Water Storage Tank (RWST) off of recirculation and perform the required lineup in STS EN-100B. Control Room personnel fully understood the plant configuration and understood that they had a closed system. They failed to realize that there would be an initial surge of a small mass of fluid through a check valve into the closed system when the pump started.

On December 6, 1995, at 2116, the pump was started. It ran for two minutes and fifty-five seconds. During the pump run, the local suction gauge, EN-PI008, was over-pressurized and damaged. EN-PI008 was over-pressurized when water from the RWST was drawn into the system when the pump started.

The root cause of this event was the failure of the Control Room personnel to consider the small amount of additional water that was added to the flow path during the pump start. This slight water addition provided the system the necessary mass to exceed the normally expected operating pressure.

Contributing factors to this event include:

- Control Room personnel did not perform the complete lineup as specified in the surveillance procedure. The procedure did not provide an adequate flow path to prevent exceeding the normally expected operating pressure of the system. This was due to the large number of steps marked "Not Applicable."
- Procedure AP 15C-002 did not give adequate guidance for the extent of "Not Applicable" use.

Corrective Steps That Have Been Taken and the Results Achieved:

- The damaged gauge (EN-PI008) was replaced.
- Other components and piping of the "B" Containment Spray system that were subjected to the pressurization event were evaluated. No adverse effects were identified.
- A review of other safety-related pumps was performed to determine if a pressure increase similar to that experienced with STS EN-100B could be encountered during a run of another pump. No other safety-related pumps

have a piping configuration like that found with the Containment Spray Pumps. All of the other safety-related pumps have a mini-flow or recirculation path that would protect the pump.

- The Superintendent Operations informed all licensed Operations personnel of his expectations concerning the use of Surveillance Test Procedures (STSPs) for post-maintenance testing. The Superintendent Operations' January 9, 1996, Electronic Mail message stated that STS procedures used for post-maintenance testing shall be performed with no alterations to the test line-up without a documented review by the responsible System Engineer.
- Standing Order #3, Revision 11, was issued on January 10, 1996. This revision of the Standing Order now includes directions to ensure that, when relying on a recirculation path to provide minimal flow, there is either a heat exchanger with cooling flow or a surge volume in the flow path.
- A step was added to the Precautions/Limitations sections of WCNO test procedures STS EN-100A and STS EN-100B, "Containment Spray Pump 'A' [B] Inservice Pump Test," to prevent the use of the eductor line as a recirculation path. The changes to these two procedures were issued as Revision 11 on January 30, 1996.
- Performance Improvement Request (PIR) 96-0197 was issued on January 23, 1996, to evaluate the guidance given for the use of "Not-Applicable" in Revision 5 of procedure AP 15C-002, "Procedure Use and Adherence." As a result of this evaluation, procedure AP 15C-002, Revision 5, was revised on February 14, 1996, to provide the necessary guidance for correctly using "Not Applicable" in procedures. To provide immediate training, the WCNO Manager Operations issued a Electronic Mail message to Operations personnel on February 15, 1996, informing them of the change to AP 15C-002, and describing the new guidance on the use of "Not Applicable".

Corrective Steps That Will Be Taken and the Date When Full Compliance Will Be Achieved:

The corrective steps described above have been completed. They are considered appropriate and sufficient to avoid further violations of this nature.