WOLF CREEK
NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

January 19, 1993
WM 93-0015

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

Reference: Letter WM 93-0002 dated January 6, 1993, from B. D. Withers, WCNOC to NRC
Subject: Docket No. 50-482: Response to Request for Additional Information Concerning Violation 482/9230-II.A.3

Gentlemen:

The attachment to this letter provides additional information concerning Violation 482/9230-II.A.3 as requested by Mr. A. T. Howell, NRC, of Mr. K. J. Moles, Wolf Creek Nuclear Operating Corporation (WCNOC), on January 8, 1993. Violation 482/9230-II.A.3 involved an example of a failure to perform an operability determination for the component cooling water system within the Technical Specification allowed outage time of 72 hours after a potentially non-conforming condition was identified on August 17, 1992. The Reference provided WCNOCs original response to the violation.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4000, or Mr. Kevin J. Moles of my staff at extension 4565.

Very truly yours,

BDWithers

Bart D. Withers
President and
Chief Executive Officer

BDW/jad

Attachment

cc: A. T. Howell (NRC), w/a
J. L. Milhoan (NRC), w/a
G. A. Pick (NRC), w/a
W. D. Reckley (NRC), w/a

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Response to Request For Additional Information

Request:

Describe why the Nuclear Regulatory Commission (NRC) was not informed of the performance of an operability determination at the enforcement conference which was held on November 3, 1992.

Response:

Wolf Creek Nuclear Operating Corporation (WCNOC) management was not aware that Work Request 4174-92 existed when WCNOC made its presentation at the enforcement conference. The personnel that were aware of the work request did not associate it with the concerns that were being raised by the NRC at the time. The NRC concerns at the time appeared to focus more on the adequacy of the operability determination for Essential Service Water (ESW) flow degradation (i.e., the basis for the operability determination), not whether an operability determination was indeed performed at all. Work Request 4174-92 was written on August 17, 1992, following the discovery of the potential low service water flowrate through Component Cooling Water (CCW) Heat Exchanger "A" to document the condition. When Violation 482/9230-II.A.3 was received on December 7, 1992, a detailed investigation into the violation uncovered Work Request 4174-92. Admittedly, this review should have been more thorough in preparation for the enforcement conference. The work request documented that the heat exchanger had been determined operable by the Shift Supervisor on August 17, 1993, based on the information available at the time.

Request:

Describe the basis for the operability determination that was made on August 17, 1992.

Response:

As described at the enforcement conference, a systematic investigation took place to determine the cause of the apparent reduced service water flowrate through CCW Heat Exchanger "A" after it was discovered during the performance of procedure STN PE-037, "ESW Heat Exchanger Flow and Differential Pressure Trending," on August 17, 1992. The testing equipment was verified to be operating properly, the position of valve EFV058 was verified to be in its proper position, and the Service Water pump was verified to be operating properly. Also, the differential pressure across the heat exchanger did not indicate that the heat exchanger was fouled. Since none of the operating parameters indicated a problem, the test engineers focused on a procedural problem.

The baseline service water flowrate through CCW Heat Exchanger "A" was established during the fifth refueling outage and was documented in procedure STN PE-037. The performance of STN PE-037 on August 17, 1992, was the first full flow test conducted since establishing the baseline value. Since previous discrepancies had been discovered with the baseline normal mode flow verification performed during the fifth refueling outage, the test engineers became convinced that the baseline value was incorrect. Also, this belief was reinforced because their previous investigation did not provide any information to refute the possibility of an incorrect baseline flowrate. With this conclusion established, Work Request 4174-92 was written to document the potential flow discrepancy. When the work request was taken to the Control Room to discuss the situation with the Shift Supervisor, the test engineers

informed him that they suspected that the baseline value was incorrect. Believing that the baseline value was incorrect and that a thorough investigation had been conducted by the test engineers, the Shift Supervisor determined that the heat exchanger was operable per Technical Specification 3.7.3, as it related to the ability of CCW to perform its intended design function. Subsequently, evaluations of the impact on ESW System for the post-Loss of Coolant Accident mode of operation determined that the system was able to perform its intended design functions. These evaluations were discussed with the NRC Senior Resident Inspector and at the enforcement conference.