WOLF CREEK
NUCLEAR OPERATING CORPORATION

Clay C. Warren
Chief Operating Officer

February 5, 1997
WO 97-0019

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 97-001-00

Gentlemen:

The attached Licensee Event Report (LER) is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) concerning failure to comply with Technical Specification surveillance requirements.

If you should have any questions regarding this submittal, please contact me at (316) 364-8831 extension 4485, or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,

Clay C. Warren

Clay C. Warren

CCW/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

1/1
IE22

NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
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TITLE (4)

Failure To Comply With Surveillance Requirements to Test Certain Components at Shutdown

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
01	06	96	97	01	00	02	05	97	FACILITY NAME	DOCKET NUMBER

OPERATING	MODE 1
POWER	100%

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

	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)	OTHER
	20.405(a)(1)(iii)	X	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
	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	TELEPHONE NUMBER (Include Area Code)
Richard D. Flannigan Manager Nuclear Engineering, Safety, and Licensing	316-364-4500

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
X	YES May 30, 1997	NO				

ABSTRACT:

On January 8, 1997, during a Quality Evaluations Audit, "Technical Specifications and Surveillance Testing," an auditor questioned whether the surveillance requirements for Technical Specification 4.7.3.b were being appropriately met. Surveillance requirement 4.7.3.b states, "At least two component cooling water loops shall be demonstrated OPERABLE: At least once per 18 months during shutdown..." It was determined that portions of this Technical Specification surveillance required to be performed "at least once per 18 months during shutdown" were being performed in Mode 1. Operations personnel have performed an initial review of surveillances that are required to be performed at shutdown and found other occurrences; specifically Technical Specifications 4.7.4.b.1 (Essential Service Water System) and 4.6.2.1.c.1 (Containment Spray System). These events are reportable per 10CFR50.73 (a)(2)(i)(B). The root cause and corrective actions are currently being determined. A supplement to this report will be submitted by May 30, 1997.

Plant Conditions Prior to the Event:

MODE = 1
Reactor Coolant Pressure = 2234 psig
Reactor Power = 100%

Basis for Reportability:

10 CFR 50.73(a)(2)(i)(B) requires each licensee to report any operation or condition prohibited by the plant's technical specifications.

Technical Specification Surveillance Requirements 4.7.3.b for Component Cooling Water [CC] states operability will be demonstrated:

At least once per 18 months during shutdown, by verifying that:

1) Each automatic valve servicing safety-related equipment or isolating the non-nuclear safety-related portion of the system actuates to its correct position on a Safety Injection and on a simulated High Flow and Low Surge Tank [CC-TNK] Level test signal, and
2) Each OPERABLE Component Cooling Water System pump [CC-P] starts automatically on a Safety Injection and Loss-of-Power test signal.

Surveillance procedures, STS IC-617A/B, "Slave Relay Test K617 Train A/B Safety Injection," test the automatic actuation of the slave relay which aligns its components to the safeguards position on a quarterly basis. STS IC-617A/B were not performed at shutdown during Refueling VIII in 1996.

Technical Specification Surveillance Requirement 4.7.4.b.1 for Essential Service Water [BI] states that operability will be demonstrated:

At least once per 18 months during shutdown, by verifying that:

1) Each automatic valve servicing safety-related equipment or isolating the non-nuclear safety-related portion of the system actuates to its correct position on a Loss-of-Power or Safety Injection test signal and on a simulated High Differential Pressure Test signal

Surveillance procedure, STS IC-927, "ESW to Air Compressor High DP Isolation," tests the automatic actuation of the slave relay which aligns its components to the safeguards position on a quarterly basis. STS IC-927 was not performed at shutdown during Refueling VIII in 1996.

Technical Specification Surveillance Requirement 4.6.2.1.c.1 for the Containment Spray System [BE] states operability will be demonstrated:

At least once per 18 months during shutdown, by verifying that:

1) Verifying that each automatic valve in the flow path actuates to its correct position on a Containment Pressure-High-3 (CSAS) test signal

Surveillance procedures, STS IC-643A&B, "Slave Relay Test K643 Train A/B Containment Spray," test the automatic actuation of the slave relay which aligns its components to the safeguards position on a quarterly basis. STS IC-643A&B were not performed at shutdown during Refueling VIII in 1996.

Failure to comply with Technical Specification surveillance requirements is reportable per 10 CFR 50.73(a)(2)(i)(B).

Description of Event:

On January 8, 1997, during a Quality Evaluations Audit, "Technical Specifications and Surveillance Testing," a WCNOC auditor questioned whether the surveillance requirements for Technical Specification 4.7.3.b were being appropriately met. He discussed his concern with Operations personnel and they determined that the surveillance requirements had been incorrectly scheduled and were not performed as required at shutdown during Refueling Outage VIII in 1996. Operations personnel are in the process of reviewing other surveillance procedures for similar discrepancies. Their initial review determined that surveillance requirements 4.7.4.b.1, and 4.6.2.1.c.1 were also not tested at shutdown as required by Technical Specifications.

Prior to Refueling Outage VIII in 1996, slave relay [RLY] tests were done as the plant was coming out of an outage to cover the retest requirements for components that were worked on during the outage. This practice met Technical Specification requirements. The schedule was changed just prior to Refuel VIII in 1996 so that slave relay tests which covered only components which were not going to be worked on during the outage were scheduled outside of the outage schedule. This was done in the interest of utilizing outage time on activities that could not be done at power. This change allowed some components to be tested "at power" versus "at shutdown" as required.

Each of the surveillance procedures are performed on a quarterly basis. The surveillance documentation which implemented these Technical Specification surveillance requirement was reviewed and determined to be technically accurate and current, and subsequently did not present an operability concern.

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

Root Cause and Corrective Action Plan

As an immediate corrective action an operability determination was performed and concluded that not meeting the entry condition as required by the surveillance requirement does not invalidate the test results.

Performance Improvement Request 97-0044 will document the root cause and corrective action plan for this event. The root cause and corrective action plan for this event will be documented in the supplement to this report due by May 30, 1997.

Safety Significance:

There is no safety significance to performing these surveillances at Mode 1 because the entry condition required by the Technical Specification Surveillance Requirements does not invalidate the results of the test. Although the surveillance were not properly scheduled to coincide with shutdown conditions, they were successfully completed on a quarterly basis which indicates operability since the previous surveillance performance.

Other Previous Occurrences:

To be supplied when the supplement is submitted.