

Bart D. Withers President and Chief Executive Officer

March 31, 1988

WM 88-0083

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 20555

> Reference: Letter dated March 1, 1983 from L. J. Callan, NRC, to B. D. Withers, WCNOC Subject: Docket No. 50-482: Response to Violation 482/8733-01

Gentlemen:

Attached is a detailed response to violation 482/8733-01 which was documented in the Reference. Violation 482/8733-01 concerns a failure to notify the NRC per 50.72(b)(2)(i) within the required four hours.

If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,

nto

Bart D. Withers President and Chief Executive Officer

TEO

BDW/jad

Attachment

cc: B. L. Bartlett (NRC), w/a R. D. Martin (NRC), w/a P. W. O'Connor (NRC), 2 w/a

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## Violation (482/8733-01): Failure to Report as Required by 10 CFR 50.72

### Finding:

10 CFR 50.72(b)(2)(i) requires that within 4 hours, the licensee shall report "Any event, found while the reactor is shut down, that, had it been found while the reactor was in operation, would have resulted in the nuclear power "ant, including its principal safety barrier, being seriously degraded . . . "

On December 9, 1987, at 8:20 a.m. (CST) with Residual Heat Removal (RHR) Train "B" out-of-service for maintenance and the plant in Mode 5, cold shutdown, "A" train emergency diesel generator was discovered to be inoperable. This made "A" train RHR inoperable. At 3:32 p.m. (CST), a report was made to NRC concerning this event as required by 10 CFR 50.72(b)(2)(vi).

Contrary to the above, the licensee failed to notify NRC by 12:20 p.m. (CST).

#### Reason For Violation:

Wolf Creek Nuclear Operating Corporation (WCNOC) believes the appropriate oriteria was used for reporting the event discussed.

On December 9, 1987, at approximately 0820 CST, the "A" Emergency Diesel Generator (D/G) was declared inoperable due to the discovery of improper D/G mechanical governor settings. This caused "A" train Residual Heat Removal System (RHR), which was operating from off-site power, to be declared inoperable although it continued to operate and perform its intended function.

An evaluation was conducted to determine the reportability of the event. Although "B" train RHR was out of service at the time of the event, the event was determined to be not reportable pursuant to 10 CFR 50.72(b)(2)(i). The work being performed on "B" train RHR is unique to Mode 5 and Mode 6 operations. At power operations this work would not have been in progress and therefore, the discovery of improper D/G mechanical governor settings would not have resulted in the nuclear power plant, including its principle safety barriers, being seriously degraded or being in an unanalyzed condition that significantly compromises plant safety. In addition, the problem discovered with "A" D/G was not common to both D/G's and therefore, would not have rendered the "B" D/G inoperable. Also, weather conditions were stable with no inclement weather forecast which could have caused a loss of off-site power for "A" train RHR. Attachment to WM 88-0083 Page 2 of 2 March 31, 1988

The D/G vendor, who was on-site, informed WCNOC that tampering was a possible cause for the improper settings. At approximately 1300 CST, the decision was made to issue a press release on the event and an evaluation was then conducted which determined reportability of the event pursuant 10 CFR 50.72(b)(2)(iv).

### Corrective Steps Which Have Been Taken and Results Achieved;

Immediately after "A" D/G was declared inoperable, Operations perconnel entered the appropriate action statements and actions wore initiated to return a train of RHR to operable status. At 1222 CST, the "A" D/G was restored to operable, thus restoring "A" train RHR to operable. On December 10, 1987, at 0155 CST, "B" train RHR was restored to operable.

Reportability evaluations were conducted as required and the report was made pursuant 10 CFR 50.72(b)(2)(vi), at approximately 1532 CST, within 4 hours of the decision to issue a press release.

# Corrective Steps Which Will Be Taken To Avoid Further Violations:

The Compliance group continues to monitor plant events and initiate reportability evaluations as required. No further steps are necessary.

#### Date When Full Compliance Will Be Achieved:

WCNOC was in full compliance per the requirements of 10 CFR 50.72 prior to issuance of this violation.