

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Wolf Creek Generating Station	DOCKET NUMBER (2) 0 5   0 0   0 4   8   2 1	PAGE (3) 1 OF 0 3
--	--	----------------------

TITLE (4) Technical Specification Violation Caused by Channel Check Requirements Being Changed In Surveillance Procedure

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)																																					
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)																																			
0 8	2 1	8 8	8 8	0 1 4	0 0	0 9	1 9	8 8			0 5   0 0   0 0																																			
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">OPERATING MODE (9)</td> <td style="width:15%;">1</td> <td style="width:15%;">THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENT 8 OF 10 CFR 5. (Check one or more of the following) (11)</td> <td style="width:15%;"><input type="checkbox"/> 20.402(b)</td> <td style="width:15%;"><input type="checkbox"/> 20.406(c)</td> <td style="width:15%;"><input type="checkbox"/> 50.73(a)(2)(iv)</td> <td style="width:15%;"><input type="checkbox"/> 73.71(b)</td> </tr> <tr> <td rowspan="5">POWER LEVEL (10) 11010</td> <td></td> <td></td> <td><input type="checkbox"/> 20.406(a)(1)(i)</td> <td><input type="checkbox"/> 50.38(a)(1)</td> <td><input type="checkbox"/> 50.73(a)(2)(v)</td> <td><input type="checkbox"/> 73.71(c)</td> </tr> <tr> <td></td> <td></td> <td><input type="checkbox"/> 20.406(a)(1)(ii)</td> <td><input type="checkbox"/> 50.38(a)(2)</td> <td><input type="checkbox"/> 50.73(a)(2)(vi)</td> <td rowspan="3">OTHER (Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td></td> <td></td> <td><input type="checkbox"/> 20.406(a)(1)(iii)</td> <td><input checked="" type="checkbox"/> 50.73(a)(2)(ii)</td> <td><input type="checkbox"/> 50.73(a)(2)(vii)(A)</td> </tr> <tr> <td></td> <td></td> <td><input type="checkbox"/> 20.406(a)(1)(iv)</td> <td><input type="checkbox"/> 50.73(a)(2)(iii)</td> <td><input type="checkbox"/> 50.73(a)(2)(vii)(B)</td> </tr> <tr> <td></td> <td></td> <td><input type="checkbox"/> 20.406(a)(1)(v)</td> <td><input type="checkbox"/> 50.73(a)(2)(iv)</td> <td><input type="checkbox"/> 50.73(a)(2)(viii)</td> </tr> </table>												OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENT 8 OF 10 CFR 5. (Check one or more of the following) (11)	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	POWER LEVEL (10) 11010			<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.38(a)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)			<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.38(a)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)			<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)			<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)			<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(viii)
OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENT 8 OF 10 CFR 5. (Check one or more of the following) (11)	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)																																								
POWER LEVEL (10) 11010			<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.38(a)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)																																								
			<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.38(a)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)																																								
			<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)																																									
			<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)																																									
			<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(viii)																																									

LICENSEE CONTACT FOR THIS LER (12)

NAME Merlin G. Williams - Manager Plant Support	TELEPHONE NUMBER AREA CODE: 3 1 6   3 1 6   4 1 - 1 8   8   3 1 1
--	--

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE):  NO:

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 words, i.e., approximately fifteen single space typewritten lines) (16)

On August 21, 1988, at approximately 1806 CDT, Operations personnel discovered that the surveillance procedure for the Engineered Safety Features Actuation System Auxiliary Feedwater Pump Low Suction Pressure Instrumentation Channel Check did not meet the surveillance requirements of Technical Specification (T/S) 4.3.2.1. Subsequent review determined that the surveillance procedure had not met the T/S surveillance requirements since May 2, 1985.

The root cause of this event was determined to be two separate errors. The first by contractor procedure writers in changing the channel check instrumentation identified in the surveillance procedure when a revision was made. The second by the individuals involved in the procedure review process who did not identify this error. A detailed recreation of the circumstances surrounding the revision to the surveillance procedure could not be made because some of the personnel involved are no longer employed at Wolf Creek Generating Station. Therefore, the cause of the channel check instrumentation being changed in the surveillance procedure could not be determined. A temporary procedure change was issued to correct the surveillance procedure on August 22, 1988. A review of this surveillance procedure has been conducted to ensure that this surveillance procedure meets the T/S surveillance requirements.

8809260068 880821  
PDR ADOCK 05000482  
S PNU

IE22  
1/1

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Wolf Creek Generating Station	DOCKET NUMBER (2)  0 5 0 0 0 4 8 2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	— 0 1 4	— 0 0 0	2	OF	0 3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

INTRODUCTION

On August 21, 1988, at approximately 1806 CDT, Operations personnel performing a routine review as a result of ongoing maintenance activities, discovered that STS CR-001, the surveillance procedure for the performance of Engineered Safety Features Actuation System (ESFAS) [JE] Auxiliary Feedwater Pump [BA-P] Low Suction Pressure Instrumentation [BA-PI] Channel Check did not meet the surveillance requirements of Technical Specification (T/S) 4.3.2.1. Subsequent review determined that surveillance procedure STS CR-001, "Shift Log for Modes 1, 2 and 3", had not met the T/S surveillance requirements for Modes 1, 2, and 3 since May 2, 1985. This event is being reported pursuant to 10CFR50.73(a)(2)(i)(B) as a violation of the plant's T/S.

DESCRIPTION OF EVENTS

The T/S surveillance requirement 4.3.2.1 requires that each ESFAS instrumentation channel shall be demonstrated operable by the performance of the ESFAS Instrumentation Surveillance Requirements specified in Table 4.3-2 of the T/S. Table 4.3-2 of the T/S requires that the ESFAS Auxiliary Feedwater Pump Low Suction Pressure Instrumentation is demonstrated operable by periodic performance of surveillances that require:

- a. A channel check at least once per 12 hours,
- b. An Analog Channel Operational Test (ACOT) at least once per 31 days, and
- c. A channel calibration at least once per 18 months.

The requirements of the channel check of the ESFAS Auxiliary Feedwater Pump Low Suction Pressure Instrumentation was originally in STS CR-001, Revision 0. On May 2, 1985, when a revision was made to the surveillance procedure, the instrumentation identified in the procedure was changed from the ESFAS instrumentation to other installed Auxiliary Feedwater Pump Suction pressure indicators [BA-PI]. Therefore, the incorrect instrumentation was surveilled from May 2, 1985, until August 21, 1988, when the error was discovered.

ROOT CAUSE

The root cause of this event was determined to be two separate errors. The first by contractor procedure writers in changing the instrumentation identified in the surveillance procedure when the revision was made and the second, by the individuals involved in the procedure review process who did not identify this error. A detailed recreation of the circumstances surrounding the revision to the surveillance procedure could not be made because some of the personnel are no longer employed at Wolf Creek Generating Station. Therefore, the cause of the channel check instrumentation being changed in the surveillance procedure could not be determined. The "reason for change" procedure change form states, "Add NRC comment, update to current format, correct refs (references) and numbers to current T/S", which does not give enough detail to determine why the specified instrumentation was changed.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Wolf Creek Generating Station	DOCKET NUMBER (2)  0 5 0 0 0 4 8 2	LER NUMBER (6)						PAGE (3)		
		YEAR	SEQUENTIAL NUMBER		REVISION NUMBER					
		8 8	0 1	4	0	0	0 3	OF	0 3	

TEXT (If more space is required, use additional NRC Form 368A's) (17)

CORRECTIVE ACTIONS

Upon discovery of this event, Operations personnel began surveilling the correct instrumentation and initiated a procedure change to correct STS CR-001. A temporary procedure change was issued to correct the surveillance procedure on August 22, 1988. This change will be incorporated as a permanent change to the surveillance procedure. A review of this surveillance procedure has been conducted to ensure that this surveillance procedure meets the T/S surveillance requirements. In addition, an in-depth review of the entire T/S surveillance requirements to ensure that they are procedurally addressed is being conducted.

ADDITIONAL INFORMATION

Although the ESFAS for the Auxiliary Feedwater Pump Low Suction Pressure Instrumentation channel check was not being adequately performed as required by T/S 4.3.2.1, the instrumentation was operable throughout this event. This was verified by the satisfactory completion of a daily checklist that includes the ESFAS Auxiliary Feedwater Pump Low Suction Pressure Instrumentation, and the monthly ACOT and 18-month channel calibration also required by T/S 4.3.2.1. Therefore, at no time during this event did conditions develop that posed a risk to the health or safety of the public. There was no damage of plant equipment or release of radioactivity during this event.

Licensee Event Report (LER) 88-004-00 discusses a previous T/S violation caused by this particular procedure revision. The corrective actions discussed in that report are specific to that event and therefore had no effect on this event. LER 87-029-00 discusses an occurrence of a T/S requirement being deleted from surveillance procedure. The changes and enhancements made to the procedure review and change process as a result of the events discussed in LER 87-029-00 should prevent future occurrences of this event.

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

September 19, 1988

WM 88-0231

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 88-014-00

Gentlemen:

The attached Licensee Event Report (LER) is submitted pursuant to 10 CFR 50.73 (a) (2) (i) concerning a Technical Specification violation.

Very truly yours,



Bart D. Withers  
President and  
Chief Executive Officer

BDW/jad

Attachment

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

IE22  
1/1