

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Wolf Creek Generating Station	DOCKET NUMBER (2) 0 5 0 0 0 4 8 2	PAGE (3) 1 OF 0 4
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TITLE (4) Technical Specification Violation Caused By Channel Check Requirement Being Deleted From 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 4	1 4	8 8	8 8	0 0 4	0 0 0	5 1	6 8	8 8			0 5 0 0 0

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §. (Check one or more of the following) (11)										
POWER LEVEL (10) 1 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)							
	20.405(a)(1)(ii)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)							
	20.405(a)(1)(iii)	50.36(c)(2)	50.73(a)(2)(vii)	<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 365A)							
	20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)	50.73(a)(2)(viii)(A)	Special Report							
	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)(ix)								

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER
NAME Merlin G. Williams - Superintendent of Regulatory, Quality and Administrative Services	AREA CODE 3 1 6	3 6 4 - 1 8 8 3 1 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	
X	I	I	M	O	N	R	3	4	4	N

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO					

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

On April 14, 1988, at approximately 1130 CST, it was determined, following an internal surveillance, that the daily channel check on the loose-part detection system had not been adequately performed beginning on May 2, 1985. The surveillance procedure STS CR-001, "Shift Log for Modes 1 and 2", did not meet the expanded channel check requirements identified by the Technical Specification (T/S) Basis which referenced Regulatory Guide 1.133. Therefore, the channel check required by T/S 4.3.3.9.a was not being fully met for the loose-part detection system.

The root cause of this event was determined to be two separate errors. The first by contractor procedure writers in deleting the requirement to audibly monitor each channel from the surveillance procedure when a revision was made. The second by the individuals involved in the procedure review process in not identifying this inadvertent deletion. 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 requirement being deleted from the surveillance procedure could not be determined. A temporary procedure change to require an audible check of each channel each shift was incorporated into the surveillance procedure on April 15, 1988 to incorporate all of the requirements for the channel check. This change will be made a permanent part of the surveillance procedure when the next permanent change to the surveillance procedure is made.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		

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

INTRODUCTION

On April 14, 1988, at approximately 1130 CST, it was determined, following an internal surveillance, that the daily channel check on the loose-part detection system [II] had not been adequately performed beginning on May 2, 1985. The surveillance procedure STS CR-001, "Shift Log for Modes 1 and 2", did not meet the expanded channel check requirements identified by the Technical Specification (T/S) Basis which referenced Regulatory Guide 1.133. Therefore, the channel check required by T/S 4.3.3.9.a was not being fully met for the loose-part detection system. The surveillance procedure was revised on April 15, 1988, to incorporate the additional requirements for the channel check. This event is being reported pursuant 10CFR 50.73(a)(2)(i)(B) as a violation of the plant's T/S. It is also being reported as a Special Report in accordance with the requirements of T/S 3.3.3.9 action a and T/S 6.9.2.

DESCRIPTION OF EVENTS

Operability of the loose-part detection system is demonstrated by periodic performance of a surveillance procedure that requires:

- a. A channel check at least once per 24 hours,
- b. An analog Channel Operational Test (ACOT) except for verification of Setpoint at least once per 31 days, and
- c. A Channel Calibration at least once per 18 months.

Regulatory Guide 1.133, "Loose-Part Detection Program for the Primary System of Light-Water-Cooled Reactors", requires that a channel check be performed at least once per 24 hours and that at least once per seven days the operator "listens to the audio portion of signals from all recommended sensors for the purpose of detecting the presence of loose-parts. If signals indicate the presence or possibility of a loose-part, station personnel should actuate the data acquisition system to obtain data for further evaluation". The requirement for listening to each audio channel [II-CHA] was not part of the current revision of the surveillance procedure.

The requirement for listening to each channel was originally in the surveillance procedure but was deleted when the first revision was made on May 2, 1985. Therefore, this event occurred from May 2, 1985 until April 15, 1988, when the requirement was again incorporated into the surveillance procedure.

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TEXT (If more space is required, use additional NRC Form 365A's) (17)

ROOT CAUSE

The root cause of this event was determined to be two separate errors. The first by contractor procedure writers in deleting the requirement to audibly monitor each channel from the surveillance procedure when the revision was made. The second by the individuals involved in the procedure review process in not identifying this inadvertent deletion. 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 requirement being deleted from the surveillance procedure could not be determined. The "reason for change" procedure change form states "Add NRC comments, update to current format, correct refs and numbers to current T/S". This does not give enough detail to determine why this requirement was deleted.

CORRECTIVE ACTIONS

A temporary procedure change to require an audible check of each channel each shift was incorporated into the surveillance procedure on April 15, 1988. This change will be made a permanent part of the surveillance procedure when the next permanent revision to the surveillance procedure is made. The channel check is performed each shift instead of daily as required to simplify the surveillance procedure. A review of this surveillance procedure will be made to ensure that this surveillance procedure meets the requirements of the appropriate Regulatory Guides. If any further reportable discrepancies are found, they will be submitted in a supplement to this report.

Licensee Event Report (LER) 87-029-00 discusses the deletion of a surveillance procedure. As a result of this event, commitments are now required to be referenced in the applicable procedure. As a result of another unrelated event, a review of the T/S Bases is being conducted to ensure that all of the requirements in the Bases are included in the surveillance procedures. This review will be completed by August 1, 1988.

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TEXT (If more space is required, use additional NRC Form 386A's) (17)

ADDITIONAL INFORMATION

Although the channel check was not being adequately performed as required by T/S 4.3.3.9.a and Regulatory Guide 1.133, the loose-part detection system was still operable throughout this event. This was verified by the satisfactory completion of the monthly ACOT and the 18 month channel calibration also required by T/S 4.3.3.9 and by various alarms received during this time period. The system was verified operable by the satisfactory completion of these other surveillance tests and by operation of the equipment in response to alarms. 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.

There has been one previous similar occurrence of a T/S requirement being deleted from a surveillance procedure. This event is reported in Licensee Event Report (LER) 87-029-00. This event began before the event discussed in LER 87-029-00 and therefore the changes and enhancements made to the procedure review and change process should prevent future occurrences of this event.

The loose-part detection system is manufactured by Rockwell International Corporation.

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

May 16, 1988

WM 88-0125

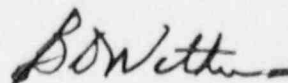
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Subject: Docket No. 50-482: Licensee Event Report 88-004-00

Gentlemen:

The enclosed Licensee Event Report is submitted pursuant to 10 CFR 50.73 (a) (2) (i) concerning a Technical Specification violation. In addition, this report is being submitted pursuant to Wolf Creek Generating Station Technical Specifications 6.9.2 and 3.3.3.9, Action Statement 'a'.

Very truly yours,



B. D. Withers  
President and  
Chief Executive Officer

BDW/jad

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

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