

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 3
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TITLE (4) Inoperable Control Room Ventilation System Due to Cognitive Personnel Error in Interpreting Technical Specifications

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 NAME		DOCKET NUMBER(S)
08	25	88	88	016	00	09	23	88			0 5 0 0 0
											0 5 0 0 0

OPERATING MODE (9) 1

POWER LEVEL (10) 1 | 0 | 0

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

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(a)	<input type="checkbox"/> 60.72(a)(2)(i)	<input type="checkbox"/> 72.71(b)
<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 60.36(a)(1)	<input type="checkbox"/> 60.72(a)(2)(ii)	<input type="checkbox"/> 72.71(a)
<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 60.36(a)(2)	<input type="checkbox"/> 60.72(a)(2)(iii)	OTHER (Specify in Abstract Below and in Text, NRC Form 305A)
<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 60.73(a)(2)(i)	<input type="checkbox"/> 60.72(a)(2)(iv)(A)	
<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 60.73(a)(2)(ii)	<input type="checkbox"/> 60.72(a)(2)(iv)(B)	
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 60.73(a)(2)(iii)	<input type="checkbox"/> 60.72(a)(2)(v)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Merlin G. Williams - Manager Plant Support	TELEPHONE NUMBER AREA CODE: 3 1 6 3 6 4 - 8 8 3 1
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC
X	V I	A C U	C 1 4 7	N					

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

Technical Specifications (T/S) were violated twice due to an error in their interpretation. With the "B" train air conditioning unit (ACU) inoperable, on September 22, 1987, at 1706 CDT, the "A" train Essential Service Water System was declared inoperable. Since this rendered both Control Room Ventilation System (CRVS) trains inoperable, T/S 3.8.3 should have been entered, but was not. Also, at 1515 CDT, on September 28, 1987, the action statement for T/S 3.7.6 was not entered when ACU repair took longer than allowed.

T/S requires operable CRVS trains, but contain no surveillance for the ACU. T/S provide temperature limits for the Control Room, and allow exceeding the limits for short periods. As a result, T/S were interpreted as not requiring an ACU for the CRVS train to be operable, as long as the temperature limits were met. At 1530 CDT on August 25, 1988, a design engineering review determined that this interpretation overlooked a post accident requirement.

The incorrect interpretation was due to cognitive personnel error, made on November 1, 1986 by management personnel. Involved personnel have been counseled concerning the need to be sensitive to design requirements of supporting equipment and to solicit engineering involvement when needed.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

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

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

EVENT DESCRIPTION

Technical Specifications were violated twice due to an error in their interpretation. On September 22, 1987 at 1706 CDT, when one section of pipe [BI-PSP] in the "A" train of Essential Service Water System [BI] was discovered to have eroded to less than the minimum wall thickness, the "A" train of Engineered Safety Features was declared inoperable. At that time, the "B" Control Room air conditioning unit [VI-ACU] was inoperable due to a failed power supply [VI-RJX]. The Shift Supervisor ordered the power supply to be removed from the "A" air conditioning unit to repair the inoperable "B" unit. That action was completed at 1933 CDT. Since this repair temporarily rendered both Control Room Ventilation System (CRVS) [VI-AHU] trains inoperative, Technical Specification 3.0.3 should have been entered. The action statement of Technical Specifications 3.0.3 was not entered. The plant was in Mode 1, Power Operation, at about 100 percent power at this time.

At 1515 CLT on September 28, 1987, when the above Control Room air conditioning unit power supply had been inoperable for seven days, the action statements of Technical Specifications 3.7.6 were not complied with. These action statements require the plant to be in Cold Shutdown in 30 hours and to place the CRVS in the recirculation mode. The plant was in Mode 3, Hot Standby, at the time and subsequently entered Mode 4, Hot Shutdown at 0020, CDT on September 30, 1987, and Mode 5, Cold Shutdown, at 0738 CDT on September 30, 1987, in preparation for refueling.

This report is being submitted pursuant to 10CFR 50.73 (a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

BACKGROUND INFORMATION

Technical Specification 3.7.6 requires both trains of CRVS to be operable in all modes. The associated action statements allow a single CRVS train to be inoperable for up to seven days. The surveillance requirements, that are required to demonstrate the operability of the CRVS, contain no requirement for the air conditioning units. Technical Specifications 3.7.12 requires that temperature limits for various areas of the plant, including the Control Room, shall not be exceeded for more than eight hours or by more than 30 degrees Fahrenheit. These two sections of Technical Specifications were interpreted as not requiring an air conditioning unit to be operable in order to establish CRVS train operability, as long as the temperature limits were met.

The CRVS is required to be able to operate in the recirculation mode for 30 days following a design basis accident. On August 25, 1988 at about 1530 CDT, a design engineering review determined that in order to maintain Control Room temperatures during this time, an air conditioning unit was required to cool the CRVS air. This determination rendered the previous interpretation invalid.

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

The operating history of the Control Room air conditioning units was reviewed to determine if declaring the CRVS train inoperable whenever its air conditioning unit was inoperable would have violated the Technical Specifications. It was determined that a plug-in power supply had remained inoperable from September 21, 1987 to October 13, 1987, resulting in the two events described above.

CAUSE OF EVENT

This event was caused by cognitive personnel error when the original interpretation overlooked the need for the ventilation train to be able to maintain Control Room temperature for 30 days while operating in the recirculation mode following a design basis accident. This need dictates an operable air conditioning unit in the CRVS Train. The original interpretation was made on November 1, 1986, by management personnel holding, or having held, Senior Reactor Operator's licenses at Wolf Creek.

CORRECTIVE ACTIONS

A revision to the Technical Specification interpretation that requires the Control Room air conditioning unit to be operable for the CRVS train to be considered operable was approved on August 29, 1988. Licensed operators were informed of the revised interpretation. Personnel involved in this interpretation have been counseled concerning the importance of being sensitive to design requirements of supporting equipment, and to solicit engineering involvement when needed.

ANALYSIS OF EVENT

If an accident had occurred during the 22 day period (while the power supply remained inoperable) that required the CRVS to operate in the recirculation mode and also rendered the redundant train inoperable, the operable power supply (a plug-in unit) could have been moved to the required air conditioning unit, as it was September 22, 1987.

There was no damage to plant equipment or release of radioactivity as a result of this event, and at no time did conditions develop that may have posed a threat to the public safety.

ADDITIONAL INFORMATION

The Control Room air conditioning unit is a Carrier Model 07E water cooled unit, nominally rated at 41.5 tons capacity.

There have been no previous Licensee Event Reports involving an error in a Technical Specification interpretation.

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

September 23, 1988

WM 88-0237

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 88-016-00

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)

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