

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Engineering and Technical Services

September 30, 1988

ET 88-0130

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

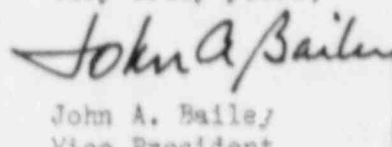
Reference: Letter dated September 2, 1988, from L. J. Callan, NRC,
to B. D. Withers, WCNOC
Subject: Docket No. 50-482: Response to NRU Violations
482/8821-02 and 04

Gentlemen:

Attached is the response to NRC Violations 482/8821-02 and 04 which were documented in the Reference. Violation 482/8821-02 involved a failure to implement the appropriate procedures. Violation 482/8821-04 involved a failure to implement adequate corrective action.

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

Very truly yours,



John A. Bailey
Vice President
Engineering & Technical Services

JAB/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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Violation (482/8821-02): Failure to Implement Procedures

Finding:

Wolf Creek Generating Station Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering . . . a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Appendix A to Regulatory Guide 1.33 specifies, in part, that safety-related activities conducted during the operations phase should be covered by written procedures.

The following are examples of failure to implement the appropriate procedures:

1. Failure to Remove an Individual From Watchstanding Activities

Procedure ADM 06-224, Revision 5, "Licensed Operator Requalification Training Program," had been established to ensure a proficient operating staff.

Procedure ADM 06-224, Step 6.5.2.5.2, requires that, "An individual enrolled in an accelerated requalification program shall be removed from all licensed duties until he has successfully completed the Accelerated Requalification Program."

Contrary to the above, after having been notified of failing the annual requalification examination on August 11, 1987, a licensed operator stood six watches during the time period of August 11-16, 1987.

2. Failure to Properly Establish a Firewatch

Procedure ADM 13-103, Revision 3, "Fire Protection: Impairment Control," had been established and implemented in accordance with the above requirements.

Procedure ADM 13-103, Step 4.1, requires, "A Fire Protection Impairment Control Permit form will be prepared for all Fire Protection System Impairments, both routine and emergency."

Contrary to the above, during the period April 13, 1987, through October 13, 1987, a fire impairment permit had not been issued for fire dampers undergoing post-modification testing.

Reason For Violation:

The failure to remove an individual from watchstanding activities for a period of six watches following notification of failing the annual requalification examination was due to not implementing the procedural requirements in a timely manner. Because 10 CFR 55.59 does not specify a time frame for removing an individual from all licensed duties, procedure ADM 06-224, Revision 5, did not specify any time frame. Therefore, the individual was allowed to complete his assigned shift.

The failure to issue a fire impairment permit for the fire dampers undergoing post modification testing was a conscious decision by management as the entire power block was under fire watches due to fire barrier penetration rework. Thus it was felt that individual impairments were not required.

Corrective Steps Which Have Been Taken and Results Achieved:

ADM 06-224, Revision 5 was revised by Temporary Procedure Change No. MA 87-252 on 8/18/87, to require "Upon formal notification of any failure . . . the affected individual shall be placed in an Accelerated Requalification Program, and removed from Licensed Duties within two (?) working days, until such time . . .". Revision 7 to ADM 06-224 has been subsequently revised by Temporary Procedure Change to require, " . . . upon notification of any failure . . . the affected individual shall be removed from Licensed Duties. If the individual is standing watch at the time of notification, he will be allowed to complete that watch . . .".

Corrective Steps Which Will Be Taken To Avoid Further Violations:

Verbatim compliance with all procedural requirements has been stressed by management and will continue to be stressed and monitored by management.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.

Violation (482/8821-04): Failure to Implement Adequate Corrective Action

Finding:

Code of Federal Regulations 10 CFR 50, Appendix B, Criterion XVI requires, in part, "Measures shall be established to assure that conditions adverse to quality, such as . . . are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Procedure QAP 16.1, Revision 1, "Corrective Action for QA Program Breakdowns," provides criteria for determining if a condition constitutes a significant condition adverse to quality, and requires, in part, that corrective action control as established in this procedure shall assure that significant conditions adverse to quality are promptly corrected to preclude recurrence.

Contrary to the above, the corrective action taken to prevent the recurrence of the inadvertent actuation of the Auxiliary Feedwater System (AFS), as reported in Licensee Event Report (LER) 482/85-019, was not sufficient to prevent the similar events reported in LER 482/86-008 and LER 482/87-018.

Reason For Violation:

Corrective actions taken following each of the inadvertent actuations of Auxiliary Feedwater System (AFS) as reported in Licensee Event Reports (LERs) 482/85-019 and 482/86-008 was considered at the time to be sufficient to prevent recurrence. Upon the third such occurrence it was acknowledged that the previous actions were inadequate to prevent recurrence.

Corrective Steps Which Have Been Taken and Results Achieved:

As identified in LER 87-018-00, the control procedure was revised to require the operator specifically verify that the MPP reset push button has been reset. A double verification was also added to the procedure to ensure that two operators make this reset verification, prior to placing the AFAS block switch in the "PERMIT" position. To date there have been no recurrences resulting in inadvertent actuation of the AFS.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

Wolf Creek Generating Station management has stressed improved in depth root cause analysis so that adequate corrective action(s) can be identified and implemented in a timely manner to ensure that significant conditions adverse to quality are promptly corrected to preclude recurrence.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.