

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

June 8, 1988

WM 88-0150

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

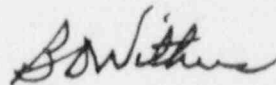
Reference: Letter dated May 11, 1988 from L. J. Callan, NRC, to  
B. D. Withers, WCNOG  
Subject: Docket No. 50-482: Response to Violation 482/8813-01  
and 02

Gentlemen:

Attached is a detailed response to violation 482/8813-01 and 02 which were documented in the Reference. Violation 482/8813-01 involved the failure to have an adequate procedure and 482/8813-02 involved a failure to assure that conditions adverse to quality are promptly identified and corrected.

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

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)

Violation (482/8813-01): Failure to Have an Adequate Procedure:

Finding:

Criterion V of Appendix B to 10 CFR Part 50, requires that activities affecting quality be prescribed by documented instructions or procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions or procedures.

Contrary to the above, Wolf Creek Generating Station Procedure ADM 07-100, Revision 33, "Preparation, Review, Approval, and Distribution of WCGS Procedures," was not appropriate to the circumstances in that it did not require temporary procedure changes to be posted or identified in the body of any procedures, including Emergency Operating Procedures (EMGs). The failure to post temporary changes for Procedure EMG E-0, "Safety Injection," resulted in a supervising operator missing a CAUTION in two steps during the implementation of this procedure on the Wolf Creek Generating Station (WCGS) simulator.

Reason For Violation:

ADM 07-100, Revision 33, Step 7.2.2.4 required, "When a temporary change is used in the performance of a procedure, reference to the temporary change should be made in the procedure at the applicable step(s), or the procedure should be marked up per the temporary change and identified to the temporary change." This step was written to require one of the two options stated but was misinterpreted by station personnel to be an option and not a requirement. The reason for the violation was failure to provide adequate instructions in the procedure to eliminate confusion.

Corrective Steps Which Have Been Taken and Results Achieved:

Temporary Procedure Change (TPC) MA 88-245 was issued to replace the existing step 7.2.2.4 with, "A temporary change used in the performance of system operation, surveillance testing, or operations response to plant evolutions shall be referenced at the applicable procedure step prior to procedure usage. Procedure manuals and file copies not used as described above are only required to have the temporary change filed in front of the procedure after distribution by the Plant Safety Review Committee (PSRC)." This change clarifies the requirement that procedures used on an immediate basis, such as alarm response procedures and emergency operating procedures, have the temporary change referenced at the applicable procedure step upon issuance of the temporary change. Procedures performed for an activity which allows preplanning, such as surveillance procedures, will have any temporary changes referenced at the applicable procedure step prior to usage.

This change to ADM 07-100 was discussed by the PSRC and members were instructed to ensure this requirement was followed. The group responsible for Operations Branch procedures in the Emergency Operating Facility, Technical Support Center, and Training were informed of the above requirement and have brought the required procedures into compliance.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The procedures discussed above have been brought into compliance with ADM 07-100, revised step 7.2.2.4. The TPC MA 88-245 to ADM 07-100, Revision 33, has been incorporated into Revision 34 which has been issued.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.

Violation (482/8813-02): Failure to Assure That Conditions Adverse to Quality are Promptly Identified and Corrected:

Finding:

Criterion XVI of Appendix B to 10 CFR Part 50, requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, an incorrect transition point was not corrected in WCGS Procedure EMG C-33 "SGTR Without Pressurizer Pressure Control." Step 7c, response not obtained column, of this procedure transitions the operator to step 18e which does not exist. During the implementation of Procedure EMG C-33 on the WCGS simulator, the supervising operator transitioned to step 19 when he observed that there was not a step 18e. It was determined that the correct transition should have been from step 7c to 7e. This transition error had apparently been previously identified but not corrected by the licensee, as evidenced by light pencil corrections noted in some copies of EMG C-33 located at the simulator.

Reason For Violation:

The root cause of this violation was a failure to detect a typographical error in the procedure. The validation of the procedure occurred on April 20, 1985 as evidenced by the validation checklist. The procedure approval date for Revision 1 is May 4, 1985. In this time period between April 20, 1985 and May 4, 1985, Step 7c was added to more speedily direct the operator how to proceed if RVLIS (Reactor Vessel Level Instrumentation System) was unavailable. This was a plant-specific step added as a

procedure enhancement. The Westinghouse Emergency Response Guidelines for this procedure do not have a Step 7c to check RVLIS availability. When the change was made, the 18e which should have been 7e was missed as a typographical error.

A contributing factor to the violation was the apparent failure to note the discrepancy on a Program Improvement Form and send it to Operations to make a procedure change once it was discovered on the simulator. Since this procedure requires multiple failures (e.g. spray valves, heaters, pressurizer PORV's) it is an infrequently done procedure on the simulator. This may account for why the pencilled in 7e did not receive more attention.

Corrective Steps Which Have Been Taken and Results Achieved:

Temporary Change 88-218 was made to procedure EMG C-33 to show the proper transition to step 7e.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

A letter has been issued to all operations personnel and the License Operator Training Supervisor instructing use of the Formal Program Improvement Form to request changes to Emergency Operating Procedures.

During the proof-reading and verification effort for Revision 2 of the Emergency Procedures, special attention will be paid to the Response Not Obtained column to ensure all transition steps are correct.

Date When Full Compliance Will Be Achieved:

Full compliance is expected by September 30, 1988, when Revision 2 of the Emergency Operating Procedures are issued.