

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

June 10, 1988

WM 88-0156

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

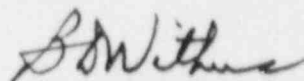
Reference: Letter dated May 12, 1988 from L. J. Callan, NRC, to
B. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Violation 482/8807-38

Gentlemen:

Attached is a detailed response to violation 482/8807-38 which was documented in the Reference. Violation 482/8807-38 involved a failure to follow procedures.

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 (482/8807-38): Failure to Follow Procedures

Finding:

Technical Specification (TS) 6.8.1 requires that written procedures shall be established, implemented, and maintained including the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33 includes procedures for the control of maintenance and modification work.

Procedure ADM 01-042, Revision 10, "Plant Modification Request Implementation," provides the requirements for planning, processing, and implementing plant modification requests (PMR) and requires that a work request be used to implement any field work required by a PMR.

Procedure ADM 01-057, Revision 12, "Work Request," establishes the use of work requests, requires that the work be performed as specified, and only allows block 26 of the work request to be checked "NO" if the maintenance activity does not affect plant operation.

Contrary to the above, on March 13 and 20, 1988, it was found that administrative procedure requirements for the use of work requests were not being implemented. The following examples were noted:

1. Work Request 70294-87 was issued to implement PMR 02173 for "Scaffolding Storage Areas in RCA." This PMR required that large scaffolding components be stacked in an orderly fashion on platform trucks or preassembled scaffold sections and that small components such as base plates and clamps be stored in metal containers with lids.

On March 20, 1988, the NRC inspector found, at the 1974 level north end that large scaffold pieces were not on platforms or scaffold sections and small components were not stored in metal containers as specified.

2. Work Request 50070-88 was issued for semi-annual maintenance on the auxiliary feedwater pump motor which required removing the pump from service.

On March 13, 1988, during review of this work request, the NRC inspector found block 26 checked "NO", along with no Technical Specification (TS) reference or time limit specified. This was incorrect in that plant operation was affected by entering a 72-hour limiting condition of operation per TS 3.7.1.2.

3. Work Request 50070-88 also required that the oil from each motor bearing be sampled and that the general condition of the old oil be recorded on the work request.

On March 13, 1988, the NRC inspector found that the general condition of the old oil was not recorded on the work request as specified.

Reason For Violation:

The failure to follow procedures in each of the above events was due to inattention to detail.

1. The requirement of PMR 02173 for "Scaffolding Storage Areas in RCA" that large scaffolding components be stacked in an orderly fashion on platform trucks or preassembled scaffold sections and that small components be stored in metal containers with lids was not followed by maintenance and modifications personnel.
2. Block 26 was checked "NO" along with no Technical Specification (TS) reference or time limit specified by the shift supervisor when he authorized the work to begin. The auxiliary feedwater pump was properly tagged out and the appropriate TS action statement entered. The appropriate TS reference and action statement time limit were identified in block 6 of the work request.
3. Electrical Maintenance personnel failed to follow the work instructions in that they did not document the general condition of the oil on the work request as required.

Corrective Steps Which Have Been Taken and Results Achieved:

1. Upon notification by the Senior Resident Reactor Inspector (SRRI), the scaffolding storage area was cleaned up and the scaffolding components properly stored. The Manager of Maintenance and Modifications discussed the storage requirements of PMR 02173 with the Modifications Supervisor and the Modifications Engineer and Craft Coordinator.
2. The Manager of Operations discussed the philosophy of block 26 with the shift supervisor who failed to correctly identify in block 26 the work request, the appropriate Technical Specification and 72 hour action statement.
3. Electrical maintenance personnel have been reinstructed by the Manager of Maintenance and Modifications on the importance of attention to detail in complying with all work instructions and assuring that all required work steps have been properly completed and documented.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The importance of following procedures and attention to detail will continue to be stressed to WCNOG personnel by supervision and management. These specific instances of inattention to detail were discussed by the Plant Safety Review Committee (PSRC) at Meeting No. 320 on May 31, 1988.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.