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APPROVED BY OMB NO. 3150-0104

Estimated burden per response to comply with this

EXPIRES 06/30/2001

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION 6-1998)

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LICENSEE EVENT REPORT (LER)

NRC FORM 366A U.S. NUCLEAR REGULATORY COMMISSION (6-98) LICENSEE EVENT REPORT (LER) TEXT CONTINUATION FACILITY NAME (1) DOCKET NUMBER (2) LER NUMBER (6) PAGE (3) YEAR SEQUENTIAL REVISIO NUMBER (NUMBER (2)) YEAR NUMBER NUMBER (3)

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OF 4

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

Wolf Creek Generating Station

Plant Conditions Prior to the Event:

Mode --- 1 Power --- 100 percent Temperature --- 586.6 °F Pressure --- 2239 psig

Basis for Reportability:

NUREG-1022, Revision 1, "Event Reporting Guidelines 10 CFR 50.72 and 50.73," Section 3.2.2(2), "Limiting Conditions for Operation," indicates that an LER is required if the conditions of a Technical Specification (TS) Limiting Condition for Operation (LCO) are not met (condition existed for a time longer than permitted by the Technical Specifications). WCNOC "Technical Requirements Manual" 16.7.2 (formerly TS 3/4.7/8) requires "All snubbers shall be OPERABLE." The associated action gives 72 hours to either replace or restore the inoperable snubber to operable status, and either evaluate or declare the attached system inoperable and follow the appropriate ACTION statement for that system. Based on the cause of the failed snubber (manufacturing deficiency), it is reasonable to assume that the deficiency existed during the period of time the snubber was installed in the plant. Since this period was in excess of the 72 hour restoration time, the event in this LER is considered a historical violation of former TS 3.7.8, and is reportable under 10 CFR 50.73(a)(2)(i)(B).

Event Description:

On September 10, 1990, a snubber failed acceleration testing following refurbishment at WCGS. Upon disassembly of the snubber, the replacement rod and bearing assembly was found separated from the end plug. The assembly was returned to the vendor (Pacific Scientific) for analysis. Based on information obtained from testing and evaluation, on September 27, 1990, Pacific Scientific notified the NRC of a Part 21 defect. The vendor determined that inadequate staking of the rods in the end plugs, along with inadequate testing of this lot, caused the defective part. The defect was subsequently determined to be limited to the lot of 20 parts supplied to Wolf Creek Generating Station (WCGS).

Purchase Order (PO) 538880 was written to return 18 assemblies to the vendor for testing (two of the 20 had previously been scrapped); however, only 17 were actually returned. The remaining snubber (S/N 14989, in the Chemical and Volume Control System at location BG21-R004) could not be removed immediately since this snubber was in a high radiation area. Snubber 14989 was dispositioned "use as is" and left in place until the next refueling outage.

WCNOC, during this time, was pursuing a program to reduce the number of snubbers required at WCGS. Plant Modification Request 03390 provided the basis for deleting 12 snubbers from plant systems (including BG21-R004). Snubber S/N 14989 was removed from service on October 7, 1991. On February 6, 1992, snubber S/N 14989 was refurbished and functionally

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tested; however, the defective part was not replaced. On March 12, 1993, WR 60140-92 installed snubber S/N 14989 at AB01-R036, on Main Steam Isolation Valve ABHV-0006.

On December 7, 1998, while reviewing information for another issue, a WCNOC work planner identified that the defective parts associated with snubber 14989 were still in service in the plant. A Performance Improvement Request (PIR) was initiated (PIR 98-3707), and Snubber 14989 was removed from the plant on December 7, 1998. The snubber was removed and testing initiated. Upon completion of testing, PIR 99-0037 was initiated to investigate the reason for and develop/implement corrective actions for this snubber having been put back into the plant.

Root Cause:

The root cause of this event is inadequate written and verbal communication within and among organizations, resulting in the failure to maintain appropriate tracking of the defective snubber rod and bearing assembly parts that were identified in 1990. Snubber S/N 14989 was in BG21-R004 prior to being refurbished and put into the AB01-R036 location, still containing the defective rod and bearing assembly. The descriptions on the WR and the Engineering disposition were both weak and did not clearly identify the potential Part 21 condition of the snubber assembly. In addition, the work planners involved in this event did not appropriately communicate regarding the Part 21 condition.

Corrective Actions Taken:

- On December 7, 1998, snubber S/N 14989 was replaced with a new snubber.
- This event was discussed with the planners involved to enhance their understanding of the importance of effective communication.

Actions to Prevent Recurrence:

- Procedure AI 16C-007, "Work Order Processing Guide," will be revised to include additional information on identification of suspected 10 CFR Part 21 components. This revision will be completed by June 18, 1999.
- The current revision of Procedure AP 05-002, "Dispositions and Change Packages," provides direction to the engineer to initiate the appropriate action tracking document to track final disposition in addition to any interim actions for the item(s) being addressed. The procedure will be enhanced to better address the disposition of degraded or nonconforming parts being tracked. This action will be completed by June 18, 1999.

Safety Significance:

There is no safety significance associated with this event. An Engineering evaluation has concluded that failure of the snubber during a seismic event would not have impacted the ability of the associated Main Steamline Isolation Valve to perform its function, nor would it have caused failure of the associated line.

NRC FORM 366A (6-98) U.S. NUCLEAR REGULATORY COMMISSION LICENSEE EVENT REPORT (LER) TEXT CONTINUATION FACILITY NAME (1) DOCKET NUMBER (2) LER NUMBER (6) PAGE (3) SEQUENTIAL NUMBER NUMBER Wolf Creek Generating Station 05000482 1998 0010 OF

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Other Previous Occurrences:

WCNOC LER 96-006-00 reported that valve stem assemblies had been replaced with defective parts (roll pins rather than solid pins) from the Warehouse. The root cause of this event was determined to be inadequate design modification procedures that failed to address stored inventory and future procurement, rather than communication failures. The 1996 issue involved warehouse parts, as opposed to installed parts. In addition, the corrective actions for the 1996 LER were subsequent to the time the issue in this LER occurred (1990 - 1991). Therefore, corrective actions for this event would not have prevented the snubber issue addressed in this LER.