

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Wolf Creek Generating Station										DOCKET NUMBER (2) 0 5 0 0 0 4 8 2 1 OF 0 3										PAGE (3) 1										
TITLE (4) Surveillances Of Power Range Low Setpoint And P-8, P-9 and P-10 Interlocks Not Performed Per Technical Specifications Due To Procedural Deficiencies																														
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 NAMES						DOCKET NUMBER(S)															
0	9	2	9	8	7	8	7	0	4	3	0	0	1	0	2	8	8	7	0 5 0 0 0						0 5 0 0 0					
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (Check one or more of the following) (11)																											
3			20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)															
POWER LEVEL (10)			20.406(a)(1)(i)				50.38(e)(1)				50.73(a)(2)(v)				73.71(c)															
0			20.406(a)(1)(ii)				50.38(e)(2)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 368A)															
			20.406(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(viii)(A)																			
			20.406(a)(1)(iv)				50.73(a)(2)(iii)				50.73(a)(2)(viii)(B)																			
			20.406(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(x)																			
LICENSEE CONTACT FOR THIS LER (12)																														
NAME										TELEPHONE NUMBER																				
Merlin G. Williams - Superintendent of Regulatory, Quality and Administrative Services										AREA CODE 3 1 6 3 6 4 - 8 8 3 1																				
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																														
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS																				
SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR																
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO																				

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

On September 29, 1987, it was discovered that surveillance testing of the Power Range (PR) Neutron Flux Low Setpoint and the P-8, P-9, and P-10 Reactor Trip System Interlocks was not being performed per the Technical Specification (T/S) Surveillance Requirements. In April, 1987, the applicable Analog Channel Operational Test (ACOT) procedures were revised to no longer require that the detector cables be disconnected for testing while at power operation during performance of monthly ACOT's. Therefore, during power operation, the ACOT's consisted of monthly verification that the permissive annunciator window was in its required state (as allowable per T/S). Credit was being taken for performance of the ACOT's without consideration of the power level at which the ACOT was performed. As a result, two plant startups occurred without a complete ACOT on the PR Low Setpoint and the P-8, P-9, and P-10 Interlocks having been performed within the previous thirty-one days.

This event has been attributed to a personnel error during the procedure revision process. The mode change checklist is being revised to ensure the required ACOT's have been performed prior to Mode 2 (Startup) entry. As discussed in Licensee Event Report 87-029, enhancements to the procedure change review process have been implemented.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Wolf Creek Generating Station	0500048287	—	043	—010	02	OF	03

TEXT (If more space is required, use additional NRC Form 365A's) (17)

INTRODUCTION

On September 29, 1987, at approximately 1300 CDT, it was discovered that surveillance testing of the Power Range Neutron Flux [IG] Low Setpoint, and the P-8, P-9, and P-10 Reactor Trip System Interlocks was not being performed per the requirements of Technical Specification (T/S) 3.3.1. At the time of discovery of this event, the unit was in Mode 3, Hot Standby, in the initial phase of Refuel Outage II. This condition is being reported pursuant to 10CFR 50.73(a)(2)(i)(B) as a condition prohibited by the plant's T/S.

DESCRIPTION OF EVENT

T/S 3.3.1 requires, in part, verification of operability of the Power Range Neutron Flux Low Setpoint by the performance of an Analog Channel Operational Test (ACOT) on a monthly basis. This surveillance is required for Mode 1, Power Operation, at power levels below the P-10 (Low Setpoint Power Range Neutron Flux Interlock) Setpoint, and Mode 2, Startup (less than or equal to five percent rated thermal power). T/S 3.3.1 further requires verification of operability of the P-8 and P-9 Reactor Trip System Interlocks by the performance of monthly ACOT's, applicable for Mode 1 operation, and verification of operability of the P-10 Reactor Trip System Interlock via a monthly ACOT, applicable for operation in Modes 1 and 2. With reactor power greater than the interlock setpoint, T/S 3.3.1 states that the required ACOT for the P-8, P-9, and P-10 Reactor Trip System Interlocks shall consist of verifying that the interlock is in the required state by observing the permissive annunciator window.

Surveillance test procedures STS IC-241, STS IC-242, STS IC-243, and STS IC-244, are utilized to comply with these and other T/S Surveillance Requirements, and are performed on a monthly basis. Each of these surveillance procedures are applicable to one of the four Power Range Neutron Flux channels [IG-DET]. In April, 1987, these procedures were revised to no longer require that the detector cables be disconnected for this testing with the unit operating at power. This change was made partially due to a concern over wear effects on the cable connectors with monthly disconnect/reconnecting. Following this procedure revision, the ACOTs were performed by verifying the state of the permissive annunciator window, which is allowable per T/S for the P-8, P-9, and P-10 Reactor Trip System Interlocks.

When the procedures were revised, no change was made in the schedule for procedure performance, i.e., the procedures remained scheduled on a monthly basis. As a result, credit was being taken for the performance of STS IC-241, STS IC-242, STS IC-243, and STS IC-244 within the previous 31 day period without consideration being given to the power level at which the surveillance procedures had been performed.

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

On September 29, 1987, during discussions with personnel from another facility, Instrumentation and Control personnel identified the fact that this method of testing might not completely satisfy the T/S Surveillance Requirements. Upon review, it was concluded that this method of testing was acceptable for power operation. However, it is believed that a complete ACOT for each of these setpoints should be performed prior to increasing reactor power beyond the point at which the Surveillance Requirement is applicable.

A review of previous performances of the revised surveillance procedures was conducted. It was determined that two unit startups (Mode 2 entries) between April 19 and September 29 had occurred without a complete ACOT having been performed within the previous thirty-one days.

ROOT CAUSE AND CORRECTIVE ACTIONS

The root cause of this event has been attributed to personnel error by Instrumentation and Control personnel during procedural revision. When the surveillance procedures were revised, it was not recognized that the revised testing method could adversely affect compliance with T/S Surveillance Requirements.

In order to ensure that a complete ACOT is performed on the Power Range Neutron Flux Low Setpoint and the P-8, P-9, and P-10 Reactor Trip System Interlock setpoints prior to Mode 2 entry, the Mode Change Checklist for entry into Mode 2 is being revised to require the performance of specific portions of STS IC-241, STS IC-242, STS IC-243, and STS IC-244 if the portions have not been performed within the previous 31 days with the unit in shutdown condition.

A previous similar occurrence of a surveillance procedure revision which adversely affected T/S Surveillance Requirement compliance is discussed in Licensee Event Report 87-029-00. In response to that event, a programmatic enhancement was made to the procedure change review process. This enhancement requires that the individual proposing to change a surveillance procedure to document that the proposed change, when incorporated, will continue to meet the requirements of the surveillance program. This change was made subsequent to the procedure revisions discussed in this report, and thus had no effect on this event. However, this change should serve to prevent future occurrences of this nature.

ADDITIONAL INFORMATION

During the time that the setpoints for the Power Range Neutron Flux Low Setpoint and the P-8, P-9, and P-10 Reactor Trip System Interlocks were not properly verified, the remaining Reactor Trip System Instrumentation and Interlocks were operable and capable of generating a reactor trip signal had conditions developed requiring a reactor trip. It is believed that this event did not pose a significant threat to the health and safety of the public.

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

October 28, 1987

WM 87-0287

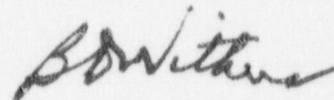
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Subject: Docket No. 50-482: Licensee Event Report 87-043-00

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: P. W. O'Connor (2)
R. D. Martin
J. E. Cummins

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11