

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Wolf Creek Generating Station</b>	DOCKET NUMBER (2) <b>0 5 0 0 0 4 8 2 1</b>	PAGE (3) <b>OF 0 4</b>
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TITLE (4) **Failure To Perform Diesel Generator Day Tank Water Removal Surveillance Causing Technical Specification Violation**

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	3	2 9	8	9	8	9	0	0	8	0	0	4	2	7	8	9			0	5	0	0	0
																			0	5	0	0	0

OPERATING MODE (9) <b>1</b>	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)																				
POWER LEVEL (10) <b>1 1 0 1 0</b>	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 20.406(b)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.36(c)(2)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	<input type="checkbox"/> 50.73(a)(2)(ix)	<input type="checkbox"/> 73.71(b)	<input type="checkbox"/> 73.71(c)	OTHER (Specify in Abstract below and in Text, NRC Form 365A)

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME <b>Merlin G. Williams - Manager Plant Support</b>		AREA CODE <b>3 1 6</b>	<b>3 6 4 - 8 8 3 1</b>

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO						

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

On March 29, 1989, it was discovered that surveillance procedure STS JE-003B, "Diesel Generator NE02 Day Tank Water Removal", was not performed on March 8, 1989, following a 1 hour 21 minute run of the Emergency Diesel Generator (D/G). This D/G run was performed in accordance with surveillance procedure STS KJ-005B. Surveillance procedure STS JE-003B is used to check for and remove accumulated water from the D/G day tank as required by Technical Specification (T/S) Surveillance Requirement 4.8.1.1.2.b. Therefore, T/S Surveillance Requirement 4.8.1.1.2.b was not met following the D/G run on March 8, 1989.

The root cause of this event has been attributed to licensed Operations personnel who erred in their performance of STS KJ-005B by marking step 5.3.5 as not applicable. To prevent recurrence, the note preceding step 5.3.5 of STS KJ-005B and step 2.3 of SYS KJ-121, the procedure referenced for system restoration following the D/G run, will be revised by May 22, 1989, to more clearly state the T/S surveillance requirements. In addition, Operations management has issued a letter to all Operations personnel emphasizing the need to read precautions and limitations prior to procedure use and to refer to T/S each time they apply.

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PDR ADOCK 05000482  
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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

INTRODUCTION

On March 29, 1989, it was discovered that surveillance procedure STS JE-003B, "Diesel Generator NE02 Day Tank Water Removal", was not performed on March 8, 1989, as required. Surveillance procedure STS JE-003B is used to check for and remove accumulated water from the Emergency Diesel Generator (D/G) [EK-DG] day tank [EK-TK] as required by Technical Specification (T/S) Surveillance Requirement 4.8.1.1.2.b. Therefore, T/S Surveillance Requirement 4.8.1.1.2.b was not met following the D/G run on March 8, 1989. This event is being reported pursuant 10CFR50.73 (a)(2)(i)(B) as a condition prohibited by the plant's T/S.

DESCRIPTION OF EVENTS

Technical Specification Surveillance Requirement 4.8.1.1.2.b requires each D/G shall be demonstrated operable at least once per 31 days and after each operation of the D/G where the period of operation was greater than or equal to one hour by checking for and removing accumulated water from the day tanks. Surveillance procedure STS JE-003B is the procedure performed by Operations personnel to meet T/S Surveillance Requirement 4.8.1.1.2.b.

Surveillance procedure STS KJ-005B, "Manual/Auto Start, Synchronization, and Loading of Emergency Diesel Generator NE02", step 5.3.5 requires the performance of STS JE-003B to meet T/S Surveillance Requirement 4.8.1.1.2.b. A note precedes this step which instructs the surveillance performer to mark step 5.3.5 as not applicable if the D/G was run for less than one hour. Additionally, step 6.1 of STS KJ-005B instructs the surveillance performer to refer to procedure SYS KJ-121, "Diesel Generator NE01 and NE02 Lineup for Automatic Operation", for system restoration to the lineup for automatic D/G starting.

In procedure SYS KJ-121, step 2.3 of the precautions and limitations section states STS JE-003B needs to be performed any time the D/G is run for greater than one hour.

Procedure STS KJ-005B, which was being performed on a weekly basis due to an increased testing frequency, was performed on March 8, 1989. At approximately 0400 CST, D/G NE02 was started and at approximately 0521 CST D/G NE02 was secured, resulting in a D/G run of approximately 1 hour 21 minutes. Discussions were then held between various Operations personnel to determine if step 5.3.5 of STS KJ-005B should be performed. As a result of these discussions, step 5.3.5 was incorrectly marked "N/A" by the Supervising Operator. Comments were added to the surveillance test sheet by the Supervising Operator and the shift Supervisor indicating step 5.3.5 was not performed because STS JE-003B is only required to be performed monthly and would be performed with the next D/G NE02 run. The system was then restored to its lineup for automatic starting of D/G NE02.

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

On March 29, 1989, Operations personnel reviewing completed surveillance procedures discovered STS JE-003B was not performed following the D/G run on March 8, 1989, as required. Operations personnel then verified the next performance of surveillance procedure STS KJ-005B to ensure surveillance procedure STS JE-003B was performed as required. Procedure STS KJ-005B was still being performed on a weekly basis due to the increased testing frequency when it was next performed on March 15, 1989. The D/G was run for approximately 1 hour 25 minutes on March 15, 1989. Following this D/G run, STS JE-003B was successfully performed.

ROOT CAUSE AND CORRECTIVE ACTIONS

The root cause of this cognitive error has been attributed to licensed Operations personnel who erred in their performance of STS KJ-005B by marking step 5.3.5 as not applicable. The note preceding step 5.3.5 instructs the performer to mark the step as not applicable if D/G NE02 was run for less than one hour. Diesel Generator NE02 was run for approximately 1 hour 21 minutes. Because the normal frequency for the performance of STS KJ-005B is monthly, Operations personnel involved believed that the requirement to perform STS JE-003B was monthly, without any tie to the D/G run itself. This led to step 5.3.5 being marked "N/A" and the comments being added to the surveillance test sheet of STS KJ-005B. In addition, step 6.1 of STS KJ-005B instructs the performer to refer to SYS KJ-121 for system restoration. Step 2.3 of SYS KJ-121 states the need to perform STS JE-003B anytime the D/G is run for greater than one hour. The previous actions of the Operations personnel subsequently resulted in the non-performance of step 2.3 of SYS KJ-121.

A contributing factor in this event was miscommunications between various Operations personnel during their discussions prior to marking step 5.3.5 of STS KJ-005B as not applicable. In one case, the Supervising Operator thought the operator who was performing STS KJ-005B said he had looked at T/S Surveillance Requirement 4.8.1.1.2.b. Another miscommunication occurred when the Control Room [NA] Operations personnel called the Operations Surveillance Coordinator to verify the day tank did not need the check for and removal of accumulated water. The Operations Surveillance Coordinator thought the Control Room Operations personnel were referring to the underground storage tank, and stated the requirements accordingly.

To prevent recurrence of this event, the note preceding step 5.3.5 of STS KJ-005B and step 2.3 of SYS KJ-121 will be revised by May 22, 1989, to more clearly state the requirement to perform STS JE-003B after each operation of the D/G where the period of operation was greater than or equal to one hour. In addition, Operations management has issued a letter to all Operations personnel emphasizing the need to read precautions and limitations prior to procedure use and to refer to T/S each time they apply.

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		8 9	— 0 0 8	— 0 0	0 4	OF 0 4

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ADDITIONAL INFORMATION

At the time of this event, the plant was operating in Mode 1, Power Operations, at approximately 100 percent power. There was no damage to plant equipment or release of radioactivity as a result of this event. At no time did conditions develop that may have posed a threat to the health or safety of the public.

There have been no previous similar occurrences of failure to perform a T/S surveillance requirement due to marking a procedural step as not applicable. However, in 1989, there have been three previous events in which various requirements of T/S Surveillance Requirement 4.8.1.1 have not been met. These events were reported in Licensee Event Reports (LER) 89-001-00, 89-006-00, and 89-007-00. The corrective actions taken as a result of each of these events were specific to the event. Although LER 89-006-00 was the result of a Chemistry personnel error, LERs 89-001-00 and 89-007-00 were the result of Operations personnel errors. To increase Operations personnel understanding of T/S Surveillance Requirement 4.8.1.1, these LERs as well as the T/S requirements are being discussed in the Operation's requalification training.

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

April 27, 1989

WM 89-0129

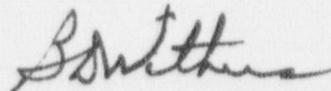
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

Subject: Docket No. 50-482: Licensee Event Report 89-008-00

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: B. L. Bartlett (NRC), w/a  
E. J. Holler (NRC), w/a  
R. D. Martin (NRC), w/a  
D. V. Pickett (NRC), w/a

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