

**WOLF CREEK**  
NUCLEAR OPERATING CORPORATION

Britt T. McKinney  
Vice President Operations & Plant Manager

**NOV 11 1999**

WO 99-0097

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 1999-012-00, Failure to Perform Technical Specification 3.8.1.1, Action b, within Required Time Limits

Gentlemen:

The enclosed Licensee Event Report (LER) 1999-012-00 is being submitted, pursuant to 10 CFR 50.73(a)(2)(i)(b), regarding failure to correctly perform Technical Specification 3.8.1.1, Action b, within the required time limits. The attachment to this letter identifies actions committed to by Wolf Creek Nuclear Operating Corporation in the enclosed LER.

If you should have any questions regarding this submittal, please contact me at (316) 364-4112, or Mr. Michael J. Angus at (316) 364-4077.

Very truly yours,

*B. McKinney*  
Britt T. McKinney

BTM/rlr

Enclosure

Attachment

cc: J. N. Donohew (NRC), w/e, w/a  
W. D. Johnson (NRC), w/e, w/a  
E. W. Merschoff (NRC), w/e, w/a  
Senior Resident Inspector (NRC), w/e, w/a

IE22

**LICENSEE EVENT REPORT (LER)**

(See reverse for required number of digits/characters for each block)

**APPROVED BY OMB NO. 3150-0104 EXPIRES  
06/30/2001**

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

FACILITY NAME (1)  
WOLF CREEK GENERATING STATION

DOCKET NUMBER (2)  
05000482

PAGE (3)  
1 OF 4

TITLE (4)  
Failure to Perform Technical Specification 3.8.1.1, Action b, within the Required Time Limits.

| EVENT DATE (5) |     |      | LER NUMBER (6) |                   |             | REPORT DATE (7) |     |      | OTHER FACILITIES INVOLVED (8) |               |
|----------------|-----|------|----------------|-------------------|-------------|-----------------|-----|------|-------------------------------|---------------|
| MONTH          | DAY | YEAR | YEAR           | SEQUENTIAL NUMBER | REV. NUMBER | MONTH           | DAY | YEAR | FACILITY NAME                 | DOCKET NUMBER |
| 10             | 14  | 1999 | 1999           | 012               | 00          | 11              | 12  | 1999 | FACILITY NAME                 | DOCKET NUMBER |

| OPERATING MODE (9) |      | MODE 1 |  | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11) |   |                  |  |                      |          |  |
|--------------------|------|--------|--|---------------------------------------------------------------------------------------------|---|------------------|--|----------------------|----------|--|
|                    |      |        |  | 20.402(b)                                                                                   |   | 20.405(c)        |  | 50.73(a)(2)(iv)      | 73.71(b) |  |
| POWER LEVEL (10)   | 100% |        |  | 20.405(a)(1)(i)                                                                             |   | 50.36(c)(1)      |  | 50.73(a)(2)(v)       | 73.71(c) |  |
|                    |      |        |  | 20.405(a)(1)(ii)                                                                            |   | 50.36(c)(2)      |  | 50.73(a)(2)(vii)     | OTHER    |  |
|                    |      |        |  | 20.405(a)(1)(iii)                                                                           | x | 50.73(a)(2)(i)   |  | 50.73(a)(2)(viii)(A) |          |  |
|                    |      |        |  | 20.405(a)(1)(iv)                                                                            |   | 50.73(a)(2)(ii)  |  | 50.73(a)(2)(viii)(B) |          |  |
|                    |      |        |  | 20.405(a)(1)(v)                                                                             |   | 50.73(a)(2)(iii) |  | 50.73(a)(2)(x)       |          |  |

LICENSEE CONTACT FOR THIS LER (12)

NAME  
Michael J. Angus  
Manager Licensing and Corrective Action

TELEPHONE NUMBER (Include Area Code)  
(316) 364-4077

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX |
|-------|--------|-----------|--------------|--------------------|-------|--------|-----------|--------------|--------------------|
|       |        |           |              |                    |       |        |           |              |                    |

SUPPLEMENTAL REPORT EXPECTED (14)

| YES |   | NO |  | EXPECTED SUBMISSION DATE (15) | MONTH | DAY | YEAR |
|-----|---|----|--|-------------------------------|-------|-----|------|
|     | x |    |  |                               |       |     |      |

ABSTRACT (16):

Technical Specification (TS) Requirement 3.8.1.1, Action b requires that, with one diesel generator inoperable, the licensee demonstrate the OPERABILITY of the offsite A.C. sources by performing Specification 4.8.1.1.1. within one hour and at least once per eight hours thereafter. Wolf Creek Nuclear Operating Corporation (WCNOC) personnel correctly performed this verification up to and including 0525 on October 14, 1999, but failed to correctly perform the verification when it was again due at 1325 hours on October 14, 1999. The verification was subsequently performed satisfactorily at 1430 hours on October 14, 1999.

The evaluation performed for PIR 99-3369 determined that this event was the result of a personnel error. The existing tracking mechanisms available for this evolution were not effectively utilized in this instance. In addition, the investigation concluded that involved individuals became distracted by collateral duties. These distractions led to reduced supervisory presence in the Control Room "at the controls" area. Corrective actions included completion of the required action, enhancement of existing aids, and coaching/counseling of involved individuals. This event had minimal plant safety significance, and did not affect the health and safety of the public.

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

Plant Conditions Prior to the Event:

Mode --- 1  
Power --- 100%  
Reactor Coolant Pressure --- 2235 psig  
Reactor Coolant Temperature --- 586.5 degrees F.

Basis for Reportability:

10 CFR 50.73(a)(2)(i)(B) requires licensees to report any operation or condition prohibited by the plant's Technical Specifications. Technical Specification (TS) Requirement 3.8.1.1 action b requires that, with one diesel generator inoperable, the licensee demonstrate the OPERABILITY of the offsite A.C. sources by performing Specification 4.8.1.1.1. within one hour and at least once per eight hours thereafter. Wolf Creek Nuclear Operating Corporation (WCNOC) personnel correctly performed this verification up to and including 0525 on October 14, 1999, but failed to correctly perform the verification when it was again due at 1325 hours on October 14, 1999. The verification was subsequently performed satisfactorily at 1430 hours on October 14, 1999.

NUREG 1022, Revision 1, states that if a condition existed for a time longer than permitted by the TS, it must be reported even if the condition was not discovered after the allowable time had elapsed and the condition was rectified immediately upon discovery. Therefore, the failure to perform TS 3.8.1.1, Action b, within its required time is reportable under 10 CFR 50.73 (a) (2) (i) (B).

Event Description:

On October 13, 1999, at 1204, Operations declared Essential Service Water (ESW) Train 'A' inoperable to allow repair of EFHV49, ESW from Containment Isolation Valve. Operations declared the appropriate equipment (associated with ESW train 'A') inoperable, and entered Technical Specification (TS) actions for ESW, Diesel Generator, Auxiliary Feedwater, Control Room A/C Unit, and Pressurizer Backup Heaters per the guidance in procedure AP 26C-004, "Technical Specification Operability." TS Requirement 3.8.1.1, Action b, requires that, with one diesel generator inoperable, the licensee demonstrate the OPERABILITY of the offsite A.C. sources by performing Specification 4.8.1.1.1. within one hour and at least once per eight hours thereafter. Operations personnel correctly completed the first one hour verification, using STS NB-005, "Breaker Alignment Verification," on October 13, 1999, at 1219. Operations personnel performed STS NB-005 at 1727 to meet the first eight hour requirement, and again performed STS NB-005 on October 14 at 0020 and 0525 to continue meeting the eight hour requirement. However, WCNOC failed to correctly perform the verification when it was again due at 1325 hours on October 14, 1999. WCGS Operations personnel discovered the error on October 14, 1999, at 1423. STS NB-005 was subsequently performed satisfactorily at 1430 hours on October 14, 1999.

Root Cause:

The evaluation performed for PIR 99-3369, which was initiated to identify the root cause and corrective actions, determined that this event was the result of a personnel error. The existing tracking mechanisms were not effectively utilized in this instance. The mechanism in existence at the time of this event was a green, magnetic placard that is

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

placed on the Main Control Board with the surveillance procedure number and time to be performed written on the card. The investigation determined that, although the placard was in place, it went un-noticed by the Reactor Operators.

The investigation also concluded that the responsible supervision were performing other duties and became distracted during this time frame. These distractions resulted in a reduced supervisory presence in the Control Room "at the controls" area. This reduced supervisory presence unnecessarily caused the Reactor Operators to be relied upon to perform their normal duties as well as be responsible for functions that had previously been performed by the Shift Operator.

**Immediate Corrective Actions Taken:**

STS NB-005, "Breaker Alignment Verification," was initiated at 1423 on October 14, 1999, upon discovery of the missed TS action. No discrepancies were noted.

**Additional Corrective Actions:**

As a result of this event, enhancements are being made to the tracking mechanisms currently available in the Control Room. For example, Operations utilizes an automated log system, AutoLog, which has an alarm function which could be used for timing evolutions. The instructions for the alarm function of AutoLog were distributed to all licensed Operations personnel, and the Superintendent Operations directed use of the AutoLog timer for conditional short term actions. Formal training will be conducted for Shift Supervisor/Shift Operator/Shift Engineer on AutoLog timer functions. This action will be completed by January 14, 1999.

Reactor Operators currently use timers to track short term actions. Existing audible timers used by Reactor Operators have the capability of less than 100 minutes. Timers have been purchased that have an alarming countdown function of at least 12 hours. These timers will be used to track conditional LCOs of 12 hours or less. Management Expectations have been developed regarding the use of these timers.

With regard to the distractions, the Supervising Operator received disciplinary action, per approved station practices, regarding this event. The Reactor Operators and Shift Supervisor received coaching/counseling, per approved station practices.

**Safety Significance:**

There was minimal safety significance associated with the late performance of STS NB-005, and the resultant failure to satisfy the time requirements of TS 3.8.1.1 Action b. The functions checked by STS NB-005 to verify offsite AC sources are checked by Control Room logs, Turbine Building logs or are alarmed in the Control Room. The elements that verify offsite power had been verified between 0700 and 1100 on October 14, 1999. In addition, STS NB-005 was completed at 1430 on October 14, 1999, with no discrepancies. Therefore, no loss of offsite circuitry occurred during this time frame.

If offsite power had been lost to either NB bus, Control Room annunciators would have alarmed. Loss of offsite power to the A train would have initiated multiple Main Control Board alarms which would have led the Control Room staff to respond by using the appropriate Alarm Responses (ALR) and OFN NB-030, "Loss of AC Emergency Bus NB01 (NB02)".

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

Loss of offsite power to the 'B' train would have caused an undervoltage on NB02, causing a 'B' Diesel Generator start signal and a 'B' Train Load Shed Emergency Load Sequencer Actuation. Again, this would have led the Control room staff to use the ALRs and OFN NB-030 to respond to the event.

Other Previous Occurrences:

Licensee Event Reports (LERs) submitted to the NRC for late performance of an action statement were reviewed. No other incident of late performance of an action statement during the previous three years was found.

**LIST OF COMMITMENTS**

The following table identifies those actions either committed to by Wolf Creek Nuclear Operating Corporation (WCNOC) in this supplemental report, or those revised from the original report. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Michael J. Angus, Manager Licensing and Corrective Action at Wolf Creek Generating Station, (316) 364-4077.

| <b>COMMITMENT</b>                                                                                                              | <b>Due Date/Event</b> |
|--------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Formal training will be conducted for SS/SO/SEs on AutoLog timer functions. This action will be completed by January 14, 2000. | January 14, 2000      |