

Wolf Creek 1

3Q/2004 Plant Inspection Findings

Initiating Events

Significance:  Sep 26, 2004

Identified By: Self Disclosing

Item Type: NCV NonCited Violation

Failure to Identify and Correct a Significant Condition Adverse to Quality

The inspectors documented a self-revealing noncited violation for failure to follow a surveillance procedure in accordance with 10 CFR Part 50, Appendix B, Criterion V, which resulted in a reactor trip. On August 22, 2004, the reactor tripped during restoration from partially completed surveillance Procedure STS IC-211B, "Actuation Logic Test Train B Solid State Protection System." The operators appropriately responded to the event using Procedures EMG E-0, "Reactor Trip or Safety Injection;" and EMG ES-02, "Reactor Trip Response." This finding had human performance crosscutting aspects in that an operator failed to follow a procedure.

The failure to follow the procedure was a performance deficiency. The finding was greater than minor because it was similar to Example 4.b of Manual Chapter 0612, Appendix E, and caused a reactor trip. The finding is of very low safety significance because, even though it resulted in a reactor trip, it did not: contribute to the likelihood of a primary or secondary system loss of coolant accident initiator, contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions would not be available, nor increase the likelihood of a fire or internal/external flood

Inspection Report# : [2004004\(pdf\)](#)

Significance:  Apr 07, 2004

Identified By: NRC

Item Type: FIN Finding

Inadequate Work Instructions and Acceptance Criteria for Maintenance Activities on the Feedwater Regulating Values

The inspectors documented a self-revealing finding for inadequate work instructions and acceptance criteria for maintenance activities on the feedwater regulating valves which resulted in a reactor trip. This finding is greater than minor because it is associated with the reactor safety strategic performance area Initiating Events cornerstone. Specifically, the failure to provide adequate work instructions and acceptance criteria for feedwater regulating valve maintenance resulted in a plant trip. The finding is of very low safety significance because, although it resulted in a reactor trip, it did not: increase the likelihood of a primary or secondary system loss of coolant accident initiator, contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions would not be available, or increase the likelihood of a fire or internal/external flood.

Inspection Report# : [2004002\(pdf\)](#)

Mitigating Systems

Significance:  Sep 29, 2004

Identified By: Self Disclosing

Item Type: NCV NonCited Violation

Failure to Adequately Model Plant Response in the Simulator

A self-revealing, noncited violation of CFR 55.46 (1) was identified regarding simulator response to a transient condition. While completing immediate actions following a reactor trip that occurred on February 13, 2004, the Balance of Plant Operator (BOP) observed what he understood to be a malfunction of the steam dump valves. Subsequent investigation revealed that the plant systems operated properly but that the Balance of Plant Operator did not expect the Steam Generator Atmospheric Relief Valves (ARV) to be open while the steam dumps were closed shortly following a plant trip. The licensee identified that the simulator had not accurately modeled steam generator atmospheric relief valves post-trip operation since initial licensing.

Based on the results of a Significance Determination Process (SDP) using Manual Chapter (MC) 0609, Appendix I, this finding was determined to have very low safety significance, since it involved a simulator fidelity issue which impacted operator actions. The failure to adequately model plant response in the simulator, discovered on February 19, 2004, is a violation of 10 CFR 55.46(c). This violation is being treated as a noncited violation 05000482/2004006-01 consistent with Section VI.A of the NRC Enforcement Policy.

Inspection Report# : [2004006\(pdf\)](#)

Significance:  Sep 29, 2004

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Design Control for Overcurrent Settings for Emergency Diesel Generator Supply Fan Breakers

A self-revealing noncited violation of 10 CFR 50, Appendix B, Criterion III, for the failure to assure that design criteria had adequately been translated into specifications and procedures associated with the Emergency Diesel Generators. Specifically, in December 2002, and February 2003, the licensee failed to correctly adjust the overcurrent trip setpoints on the newly installed, different manufacture, Emergency Diesel Generator supply fan breakers. On March 12, 2003, Emergency Diesel Generator "A" supply fan Breaker NG03DBF6 was found tripped, but no problem was identified. On April 12 and April 15, 2003, additional failures of NG03DBF6 were identified. Evaluation determined that new breakers had been installed with overcurrent trips set too low to allow for the starting inrush current. The Emergency Diesel Generators were determined not to be affected because the outside temperature had not exceeded 79 degrees Fahrenheit (F), which is the temperature at which the fans are required to be operable.

The finding is greater than minor because it affected that Mitigating Systems Cornerstone objective of equipment reliability, in that the failure of the Emergency Diesel Generator supply fans could have made the Emergency Diesel Generator inoperable if the outside temperatures had exceeded 79 degrees F. The finding is of very low safety significance because at the time of the breaker failures the outside air temperature had not exceeded 79 degrees F; therefore there was no loss of safety function. This violation is being treated as a noncited violation 05000482/2004006-02 consistent with Section VI.A of the NRC Enforcement Policy.

Inspection Report# : [2004006\(pdf\)](#)

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Significance: Apr 07, 2004

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Fire Barriers at Seismic Gaps

The inspectors identified a noncited violation of Technical Specification License Condition 2.C(5)(a) because the licensee failed to provide adequate 3-hour rated fire barriers between fire areas containing redundant safe shutdown equipment in accordance with 10 CFR Part 50, Appendix R, Section III.G.2, requirements. The inspectors identified that approximately 20 inches of fire barrier material between the main steam enclosure and the auxiliary feedwater system flow control valve rooms was missing. The fire barrier material was missing from the approximately 4-inch wide seismic gap between the reactor and auxiliary buildings. The licensee immediately placed fire barrier material in the seismic gap and wrote Performance Improvement Request 2003-3704 to document the condition. The licensee determined that an inadequate design for fire barriers at seismic gaps had also resulted in slightly degraded fire barriers at 14 other locations. After identification, the licensee installed the required fire barrier seal material to restore the 3-hour rating of these 14 additional fire barriers.

This finding is greater than minor because it is similar to the example in Inspection Manual

Chapter 0612, Appendix E, Section 2.e. In the as-found condition, the fire penetration seals at the seismic gaps were not rated to perform their function to prevent the spread of fire for 3 hours. However, this finding is of very low safety significance because, overall, the fire barriers would have provided the protection needed. There was not a credible fire scenario that would affect the defense-in-depth design requirements. Fourteen other fire barrier installations were in accordance with an inadequate design, but there were no significant gaps between fire areas and, in some cases, the fire seal material was butted up against each other at a right angle.

Inspection Report# : [2004002\(pdf\)](#)

Barrier Integrity

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Significance: Sep 26, 2004

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Follow Procedure, Which Resulted in a Reactor Trip

The inspectors identified a noncited violation of Criteria XVI of 10 CFR Part 50, Appendix B, Corrective Action, for failure to identify and correct a significant condition adverse to quality. Specifically, the licensee failed to recognize that the containment atmosphere radiation gaseous monitors were inoperable. The monitors were not able to meet the operability requirement of detecting a reactor coolant leakage rate of 1 gallon per minute in less than 1 hour.

This finding was greater than minor because the containment gas channel radiation monitors were not capable of performing the design bases function for an extended period of time. The inoperability of the containment radiation monitor resulted in potential impact on reactor safety and adversely affected the reactor coolant leakage performance attribute of the barrier integrity cornerstone. The finding was of very low safety significance because other methods of reactor coolant system leak detection were available to the licensee and no actual leak had occurred. The unavailability of the gaseous channel leak detection function did not contribute to an increase in core damage sequences when evaluated using the significance determination process Phase 2 worksheets

Inspection Report# : [2004004\(pdf\)](#)

Emergency Preparedness

Occupational Radiation Safety

Significance:  Jun 26, 2004

Identified By: Self Disclosing
Item Type: NCV NonCited Violation

Failure to obtain a radiological survey prior to moving materials from a contaminated area.

Green. A self-revealing noncited violation of a Technical Specification 5.4.1(a) required procedure was reviewed because workers failed to obtain a radiological survey before removing materials from a contaminated area. On December 1, 2003, three workers alarmed the personnel contamination monitors upon exiting the radiologically controlled area because they had become contaminated. A followup survey of the work area identified contamination levels up to 100,000 disintegrations per minute per 100 cm². The licensee determined that the personnel became contaminated when they improperly moved a drip catch from a posted contaminated area.

The failure to obtain a radiological survey before removing materials from a contaminated area is a performance deficiency. This finding is greater than minor because it is associated with the occupational radiation safety program and process attribute and affected the cornerstone objective, which is to ensure adequate protection of the worker health and safety from exposure to radiation. Using the occupational radiation safety significance determination process, the inspector determined that the finding was of very low safety significance because it did not involve (1) ALARA planning and controls, (2) an overexposure, (3) a substantial potential for overexposure, or (4) an impaired ability to assess dose. In addition, this finding had a cross-cutting aspect associated with problem identification and resolution. The immediate corrective actions were narrowly focused.

Inspection Report# : [2004003\(pdf\)](#)

Significance:  Jun 26, 2004

Identified By: NRC
Item Type: NCV NonCited Violation

Failure to provide adequate contaminated area controls.

Green. A self-revealing noncited violation of a Technical Specification 5.4.1(a) required procedure was reviewed because a health physics technician failed to provide adequate contaminated area controls. On October 31, 2003, after working on a refueling water storage tank line flange, three personnel alarmed the personnel contamination monitors as they exited the radiologically controlled area because they had become contaminated. The licensee determined that the health physics technician covering the above work activity did not properly establish contamination controls, area posting and protective clothing instructions in accordance with procedural requirements.

The failure to provide adequate contaminated area controls is a performance deficiency. This finding is greater than minor because it is associated with the occupational radiation safety program and process attribute and affected the cornerstone objective to ensure adequate protection of the worker health and safety from exposure to radiation. Using the occupational radiation safety significance determination process, the inspector determined that the finding was of very low safety significance because it did not involve (1) ALARA planning and controls, (2) an overexposure, (3) a substantial potential for overexposure, or (4) an impaired ability to assess dose. In addition, this finding had a cross-cutting aspect associated with problem identification and resolution. The immediate corrective actions were narrowly focused.

Inspection Report# : [2004003\(pdf\)](#)

Significance:  Dec 31, 2003

Identified By: NRC
Item Type: NCV NonCited Violation

Failure to Adequately Control Access to a Very High Radiation Area

The inspector identified a noncited violation of 10 CFR 20.1602 because the licensee failed to institute measures to ensure that an individual is not able to gain unauthorized access to a very high radiation area. Specifically, on October 28, 2003, the inspector observed that the area surrounding a locked ladder leading down to the reactor under-vessel area, a very high radiation area, was not provided with a physical barrier that completely enclosed the area. Radiation levels at the bottom of the ladder, one meter away from the withdrawn in-core instrument thimbles, were approximately 640 Rads per hour. An individual could have climbed over the handrail and climbed down the outside of the ladder using the fall protection cage. The finding is in the licensee's corrective action program as Performance Improvement Request 2003-3220.

The finding was greater than minor because it affected the Occupational Radiation Safety cornerstone objective to ensure adequate protection of worker health and safety from exposure to radiation and the finding was associated with the cornerstone attribute (program & process). The finding involved an individual's potential for unplanned or unintended dose. When processed through the Occupational Radiation Safety Significance Determination Process the finding was determined to be of very low safety significance because the finding was not associated with as low as reasonably achievable planning or work controls, there was no overexposure nor a substantial potential for overexposure, and the ability to assess dose was not compromised.

Inspection Report# : [2003006\(pdf\)](#)

Significance:  Dec 31, 2003

Identified By: NRC
Item Type: NCV NonCited Violation

Four Examples of the Failure to Perform Radiological Surveys

The inspectors identified four examples of a noncited violation of 10 CFR 20.1501(a), because the licensee failed to perform required radiological surveys to ensure compliance with 10 CFR 20.1204(a) and 10 CFR 20.1902(b). On October 19, 2003, the licensee did not perform adequate surveys to assess changes in radiological conditions during chemical cleaning of the reactor coolant system. On October 22, 2003, the licensee did not perform an adequate survey of the workers breathing zone while decontaminating of the reactor cavity seal ring. These findings are in the licensee's corrective action program as Performance Improvement Requests 2003-3069 and -3136 respectively.

The finding is greater than minor because it affected the Occupational Radiation Safety cornerstone objective to ensure adequate protection of worker health and safety from exposure to radiation and the finding is associated with the cornerstone attribute (program & process). The finding involved an individual's potential for unplanned or unintended dose. When processed through the Occupational Radiation Safety Significance Determination Process the finding was determined to be of very low safety significance because the finding was not associated with as low as reasonably achievable planning or work controls, there was no overexposure or a substantial potential for overexposure, and the ability to assess dose was not compromised.

Inspection Report# : [2003006\(pdf\)](#)

Public Radiation Safety

Physical Protection

[Physical Protection](#) information not publicly available.

Miscellaneous

Significance: N/A Sep 29, 2004

Identified By: NRC

Item Type: FIN Finding

Identification and Resolution of Problems

The team reviewed approximately 200 Performance Improvement Requests program documents, apparent and root cause analyses and plant procedures for the identification and resolution of problems. Based on this review, the team found that the processes to identify, prioritize, evaluate, and correct problems were generally effective; thresholds for identifying issues remained appropriately low and, in most cases, corrective actions were adequate to address conditions adverse to quality.

Cross-cutting aspects, associated with identification, prioritization and evaluation and correction of degraded conditions in the plant were identified. The team found that these cross-cutting aspects were the exception and not the rule and most issues were minor. However, in a few cases, licensee personnel did not initiate corrective action documents for known equipment degradations. In other cases, planned corrective actions were not managed to a satisfactory completion. Either the issue was not corrected by the planned actions, or the planned actions were cancelled.

Based on the interviews, the team concluded that a positive safety-conscious work environment exists at Wolf Creek. The team determined that employees and contractors feel free to raise safety concerns to their supervision or bring concerns to the employees concern program.

Inspection Report# : [2004006\(pdf\)](#)

Last modified : December 29, 2004