UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

May 6, 2005

Rick A. Muench, President and
Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KS 66839

SUBJECT: WOLF CREEK GENERATING STATION - NRC INTEGRATED INSPECTION REPORT 05000482/2005002

Dear Mr. Muench:

On April 7, 2005, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Wolf Creek Generating Station. The enclosed integrated report documents the inspection findings which were discussed on April 8, 2005, with members of your staff.

The inspections examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings of significance were identified. However, one licensee-identified violation which was determined to be of very low safety significance is listed in Section 4OA7 of this report. If you contest this noncited violation, you should provide a response within 30 days of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN.: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator Region IV; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Wolf Creek Generating Station.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, and its enclosure, will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

David N. Graves, Chief
Project Branch B
Division of Reactor Projects

Docket: 50-482
License: NPF-42

Enclosure:
NRC Inspection Report 05000482/2005002
w/attachment: Supplemental Information

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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket:	50-482
License:	NPF-42
Report:	05000482/2005002
Licensee:	Wolf Creek Nuclear Operating Corporation
	Wolf Creek Generating Station
Location:	1550 Oxen Lane NE Burlington, Kansas
Dates:	January 1 through April 7, 2005
Inspectors:	F. L. Brush, Senior Resident Inspector T. B. Rhoades, Resident Inspector
Approved By:	D. N. Graves, Chief, Project Branch B

Enclosure

SUMMARY OF FINDINGS

IR 5000482/2005002; 1/1/05 - 4/7/05; Wolf Creek Generating Station.

The report covered a 14-week period of resident inspection. One Green licensee-identified noncited violation was identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. Licensee-Identified Violations

One violation of very low safety significance, which was identified by the licensee, has been reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into the corrective action program. This violation and corrective actions are listed in Section 4OA7 of this report.

REPORT DETAILS

Summary of Plant Status

The plant operated at essentially 100 percent power for the report period with the following exceptions. On January 23, 2005, the licensee shut down the reactor due to a leak in the main generator cooling water system. On February 1, 2005, the licensee started up the reactor and on February 3 placed the generator online. On February 4, 2005, the licensee returned the plant to full power. On February 10, 2005, the licensee reduced power to approximately 82 percent when one of the 345 kV lines connected to the switchyard deenergized due to a fault on the line. The fault was not in the switchyard. The licensee returned the plant to full power the same day after the line was repaired.

1. REACTOR SAFETY
Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather (71111.01)

a. Inspection Scope

The inspectors performed a walkdown of various power block buildings to verify that adverse weather would not affect mitigating systems. The inspectors discussed aspects of severe weather preparations with licensee personnel.

- OFN SG-003, “Natural Events,” Revision 12
- Radiological Emergency Response Plan, EAL-11, “Natural Phenomena,” Revision 5
- Updated Safety Analysis Report

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment (71111.04)

a. Inspection Scope

Partial System Walkdowns: The inspectors performed the following four partial walkdowns:

- Emergency Diesel Generator A, January 20, 2005
- Motor-driven auxiliary feedwater Train B during a motor-driven auxiliary feedwater Train A outage, January 13, 2005

- Safety injection system Train B during a safety injection system Train A outage, February 8, 2005
- Turbine-driven auxiliary feed system during an Emergency Diesel Generator A outage, January 7, 2005

The inspectors performed the walkdowns to verify equipment alignment and identify discrepancies that could impact redundant system operability.

Complete System Walkdown

The inspectors completed a walkdown of the fuel pool cooling and cleanup system Train A on March 25, 2005. The inspectors performed the walkdowns to verify equipment alignment and identify discrepancies that could impact redundant system operability. The inspectors used the Updated Safety Analysis Report, system drawings, and system lineup checklists to perform the walkdown.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

a. Inspection Scope

Quarterly Fire Area Walkdowns. The inspectors toured the following six areas to assess the licensee's control of combustibles, the material condition and lineup of fire detection and suppression systems, and the material condition of manual fire equipment and passive fire barriers. The licensee's fire preplans and fire hazards analysis report were used to identify important plant equipment, fire loading, detection and suppression equipment locations, and planned actions to respond to a fire in each of the plant areas selected. Compensatory measures for degraded equipment were evaluated for effectiveness.

- Auxiliary building corridor 2000 foot level, January 31, 2005
- Auxiliary feedwater pump and valve rooms, February 7, 2005
- Cable spreading rooms, February 8, 2005
- Turbine building operating deck north end, January 27, 2005
- South electrical penetration room, March 24, 2005
- Spent fuel pool cooling pump rooms, March 24, 2005

b. Findings

No findings of significance were identified.

1R06 Flood Protection Measures (71111.06)

a. Inspection Scope

Internal. On March 24, 2005, the inspectors completed verification that the licensee's flood mitigation plans and equipment were consistent with the licensee's design requirements and the risk assumptions in the Updated Safety Analysis Report. The area inspected was the auxiliary building 1074 foot level floor and equipment drains and sumps. The drains and sumps removed water from the emergency core cooling system rooms. The inspectors reviewed the following:

- M-12LF01, -02, and -03, "Auxiliary Floor and Equipment Drain System," piping and instrumentation diagrams
- Work Order 03-254772-000
- Updated Safety Analysis Report

External. On April 4, 2005, the inspectors verified that the licensee's flood mitigation plans and equipment were consistent with the licensee's design requirements and the risk assumptions in the Updated Safety Analysis Report. The inspectors conducted walkdowns of areas susceptible to external flooding to verify that risk-significant equipment was adequately protected. The inspectors also examined the plant cooling lake's normal and emergency overflow structures. The inspectors observed that the structures were clear of debris which could restrict overflow function.

b. Findings

No findings of significance were identified.

1R07 Heat Sink Performance

On February 11, 2005, the inspectors completed a review of the heat exchanger performance test data for the Emergency Diesel Generator A intercooler heat exchanger based upon its high ranking in the plant-specific risk assessment. The licensee performed the test using Procedure STN PE-37A, "ESW Train A Heat Exchanger Flow and DP Trending," Revision 6. The heat exchanger was cooled by the essential service water system. The inspectors also observed the condition of the heat exchanger when it was opened for eddy current testing. The inspectors reviewed the performance test data to verify the following:

- Test acceptance criteria and results appropriately considered differences between testing conditions and design conditions.
- Inspection results were appropriately categorized against pre-established engineered acceptance criteria and were acceptable.

- The frequency of testing or inspection was sufficient to detect degradation prior to loss of heat removal capabilities below design-basis values.
- Test results considered test instrument inaccuracies and differences.
- The licensee had developed acceptance criteria for its biofouling controls.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification (71111.11)

a. Inspection Scope

The inspectors observed control room operator simulator training to verify that the licensed operator requalification program ensured safe operation of the plant by adequately evaluating how well the operators and crews mastered the training objectives. The inspectors used Simulator Guide LR5004005, "Loss of all AC While Shutdown," Revision 4, to evaluate operator performance. The operators appropriately responded to the event and exhibited good three-way communications and peer checking. The inspector also attended the training session critique.

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness (71111.12)

a. Inspection Scope

The inspectors reviewed the licensee's maintenance rule implementation for the following two systems to assess the effectiveness of maintenance efforts in accordance with 10 CFR 50.65.

- Feedwater system
- Fire protection system

The inspector's reviewed work practices, scoping in accordance with 10 CFR 50.65(b), performance, 10 CFR 50.65(a)(1) or (a)(2) classification and reclassification goals, and identification of common cause failures. The inspectors reviewed various documentation and discussed maintenance rule items with licensee personnel.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors reviewed five of the licensee's risk assessments for equipment outages as a result of planned and emergent maintenance in accordance with the requirements of 10 CFR 50.65(a)(4) and licensee Procedure AP 22C-003, "Operational Risk Assessment Program," Revision 10. The inspectors also discussed the planned and emergent work activities with planning and maintenance personnel. The inspector's reviewed the following:

- Operational risk assessments for planned maintenance for the weeks of January 3, 10, and 31 and March 14 and 28, 2005.
- Actual, planned, and emergent work schedules for the same weeks.

b. Findings

No findings of significance were identified.

1R14 Operator Performance During Nonroutine Evolutions and Events (71111.14)

a. Inspection Scope

The inspectors observed the licensee's performance during low power operation while manually controlling feedwater flow. During a reactor startup and power ascension, problems were identified with the control systems of feedwater regulating Valves A and C. Because of these problems, feedwater to Steam Generator C was controlled by the feedwater regulating bypass valve and feedwater to Steam Generator A was manually controlled by an operator until repairs were made.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors selected four operability determinations conducted by the licensee during the report period involving risk-significant systems or components to review. The inspectors evaluated the technical adequacy of the licensee's operability determinations, verified that appropriate compensatory measures were implemented, and verified that the licensee considered all other pre-existing conditions, as applicable. Additionally, the inspectors evaluated the adequacy of the licensee's problem identification and resolution program as it applied to operability evaluations. Specific operability evaluations reviewed are listed below.

The components or systems were:

- Containment cooler cooling coils' seismic restraint fasteners, January 6, 2005
- Essential service water traveling water Screen A, January 10, 2005
- Emergency Diesel Generator B lubricating oil system, March 31, 2005
- Offsite power sources to NB-01 and -02, March 9, 2005

The inspectors also reviewed applicable portions of the Updated Safety Analysis Report, Technical Specifications, Technical Specification Bases, and system drawings and discussed the operability evaluations with licensee personnel.

b. Findings

No findings of significance were identified.

1R16 Operator Workarounds (71111.16)

a. Inspection Scope

On February 23, 2005, the inspectors completed the review of the cumulative effects of operator workarounds to determine the following:

- Effect of the workarounds on system reliability, availability, and potential for misoperation.

- Whether the cumulative effects of the workarounds could affect multiple mitigating systems.

- The cumulative effects of the workarounds on operator response to plant transients and accidents.

The inspectors reviewed licensee Administrative Procedure AI 22A-0021, "Operator Work Arounds/Burdens," Revision 2, and the licensee's operator workaround and burden lists.

The licensee did not identify any items on the workaround list. However, there were deficiencies identified on the burden list. The inspectors then discussed with licensee operations personnel long-term equipment problems that were not included in the workaround or burden lists. The inspectors reviewed the deficiencies that were not on the lists to determine if they met the licensee's definition of a workaround or operator burden. The inspectors reviewed the cumulative effects of the burdens and long-term equipment problems to determine whether they could affect mitigating system response during normal and emergency plant operations.

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed or observed seven postmaintenance tests on the following equipment or systems to verify that procedures and test activities are adequate to verify system operability:

- Component cooling water Train A, March 3, 2005
- Emergency Diesel Generator A, February 18, 2005
- Emergency Diesel Generator B, March 2, 2005
- Controllers for feedwater flow control Valves AE FCV-510 and -530, February 3, 2005
- Motor-driven auxiliary feedwater Train B, March 2, 2005
- Residual heat removal Train A, March 14, 2005
- Turbine-driven auxiliary feedwater train, March 25, 2005

In each case, the associated work orders and test procedures were reviewed to determine the scope of the maintenance activity and determine if the test adequately tested components affected by the maintenance. The Updated Safety Analysis Report, design basis documents, and selected calculations were also reviewed to determine the adequacy of the acceptance criteria listed in the test procedures.

b. Findings

No findings of significance were identified.

1R20 Refueling and Outage Activities (71111.20)

a. Inspection Scope

Maintenance Outage. The inspectors observed and reviewed the activities of the maintenance outage from January 29 through February 4, 2005. Specific inspection activities required by Attachment 71111.20 are documented in the following paragraphs:

Monitoring Shutdown Activities. The inspectors observed portions of the plant transition from power operation in Mode 1 to shutdown in Mode 3.

Clearance Activities. The inspectors verified that various clearance order tags were properly hung and that associated equipment was appropriately configured. The inspectors specifically reviewed the main generator cooling system clearance order.

Electrical Power. The inspectors verified the operability and availability of onsite and offsite power sources required for Mode 3 operation based on walkdowns and discussions with licensee personnel.

Containment Closure. The inspectors verified that containment was in the proper configuration during the outage.

Monitoring of Heatup and Startup Activities. The inspectors observed the plant startup and return to full power operation. The licensee conducted these activities in accordance with the plant Technical Specifications and procedures. The inspectors verified that the appropriate equipment was available for mode changes.

Refueling Outage. The inspectors completed a review of the licensee's outage risk control plan. This included a review of the licensee's Refueling Outage 14 risk assessment report, an interview with the scheduling manager and review of the outage schedule. The inspectors verified that the licensee had appropriately considered risk, industry experience, and previous site-specific problems.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed or observed all or part of the six surveillance activities in accordance with inspection Attachment 71111.22 to verify that risk significant structures, systems, and components are capable of performing their intended safety functions and assessing their operational readiness:

- STS AL-101, "MDAFW Pump A Inservice Pump Test," Revision 31, January 18, 2005
- STS EJ-209B, "Train B RHR System Inservice Valve Test," Revision 0, January 26, 2005
- STS KJ-005A, "Manual/Auto Start, Synchronization and Loading of Emergency D/G NE01," Revision 44, January 10, 2005
- STS KJ-005B, "Manual/Auto Start, Synchronization and Loading of Emergency D/G NE02," Revision 42, January 20, 2005
- STS KJ-011B, "DG NE02 24 Hour Run," Revision 14, March 28, 2005
- STS KJ-015A, "Manual/Auto Fast Start, Sync & Loading of EDG NE01," Revision 17, February 15, 2005

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

On February 9, 2005, the inspectors completed the review of licensee temporary modification for the rod control circuitry. The temporary modification installed a digital recorder to monitor various signals in the circuitry due to unplanned control rod movements. The modification review consisted of the modification order, associated applicability determination, and the 10 CFR 50.59 screening. The inspectors verified that the modification had not adversely affected the safety functions of systems important to safety.

The inspectors reviewed Temporary Modification Order 04-024-RP and applicable portions of the Updated Safety Analysis Report.

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation (71114.06)

a. Inspection Scope

On January 19, 2005, the inspector observed and reviewed emergency drill activities in the simulator control room, the Technical Support Center, and the emergency offsite facility. The drill involved a loss of control board annunciators, offsite release of radionuclides, and loss of all ac power to the vital buses. The inspectors attended the simulator critique, reviewed the drill critique sheets and other associated documents and information, and discussed the drill activities with various licensee personnel.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA2 Identification and Resolution of Problems

1. Annual Sample Review

a. Inspection Scope

On March 14, 2005, the inspectors completed a detailed review of Performance Improvement Request (PIR) 2004-2813. The PIR documented the licensee's common cause analysis of reactor trips and unplanned downpowers for a 24-month period ending in October 2004.

The following is a list of the events reviewed in the PIR:

- Five reactor trips
- Three unplanned power reductions
- Three unplanned engineered safety feature actuations
- Nine maintenance preventable functional failures of high-risk significant equipment
- Two licensee incident investigation team evaluations of Refueling Outage 13 events

b. Findings and Observations

There were no findings identified.

4OA6 Meetings, including Exit

The inspectors presented the resident inspection results to Mr. E. A. Ray and other members of licensee management after the conclusion of the inspection on April 8, 2005.

The inspectors asked the licensee whether or not any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

4OA7 Licensee-Identified Violations

The following violation of very low safety significance (Green) was identified by the licensee and meets the criteria of Section VI of the NRC Enforcement Policy, NUREG 1600, for being dispositioned as a noncited violation.

A noncited violation of Technical Specification 5.4.1.d, "Fire Protection Program," was identified by the licensee for failing to maintain the Halon gaseous fire suppression systems in the qualified configuration for an extended duration. Each of the Halon pneumatic actuators was equipped with Ports A and B. Because nonsymmetric actuator pistons were used in the pneumatic actuators, correct alignment of the ports was necessary to preserve system design and ensure reliable operation. At Wolf Creek, the actuation piping to Ports A and B were reversed in 19 of the 20 Halon system pneumatic actuators. The vendor did not plan to qualify this new configuration and the licensee promptly corrected the actuation piping. To determine the significance of this issue, the system vendor tested system actuation in the nonqualified configuration. The system actuated after only a short time delay. Using the criteria in Attachment 2 to Appendix F of Manual Chapter 0609, “Significance Determination Process,” for findings against gaseous based suppression, the degradation rating was determined to be low and the finding screened to Green (very low safety significance). This issue was documented in the licensee’s corrective action program as PIR 2005-0072. The inspectors concluded this finding was of very low safety significance because of the low degradation level.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

K. A. Harris, Director, Performance Improvement and Learning
S. E. Hedges, Vice President Operations and Plant Manager
R. Muench, President and Chief Executive Officer
K. Scherich, Director Engineering
M. Sunseri, Vice President, Oversight

ITEMS OPENED, CLOSED, AND DISCUSSED

None

LIST OF DOCUMENTS REVIEWED

Equipment Alignment

- CKL AL-120, “Auxiliary Feedwater Normal Lineup,” Revision 33
- CKL EC-120, “Fuel Pool Cooling And Cleanup System Normal Valve Lineup/Breaker Checklist,” Revision 12
- CKL EM-120, “Safety Injection System Lineup Checklist,” Revision 22

Maintenance Effectiveness

- Final scope evaluation for KC and FP, fire protection system
- Functional failure evaluations for AE-01, feedwater system
- Maintenance rule bases information for AE-01, feedwater system
- Maintenance rule expert panel meeting minutes for AE-01, feedwater system
- Maintenance rule expert panel meeting minutes for KC and FP, fire protection system
- Maintenance rule performance evaluation for KC and FP, fire protection system
- System health report for KC and FP, fire protection system
- PIR 2004-0435
- Temporary Modification 04008SL

- Work Orders 03-252067-001, 03-258226-001, 04-260818-000, 04-265926-000, 04-266757-000, 04-267222-000, 05-269409-000, and 05-269667-000

Operability Evaluations

- —620-00095 W04, “Cooling Coil Design Report”
- Operator logs
- Operability Evaluation OE OF-05-01
- Operations Information Report 99-KJ-001, Revision 0
- PIR 99-KJ-001
- Reportablility Evaluation Request 2005-004
- Work Order 04-268712-003, Essential service water Train A traveling screen

Performance Indicator Verification

- Licensee performance indicator worksheets
- Performance indicator summary reports
- Selected NRC inspection reports
- Selected control room operator logs

Postmaintenance Testing

- Work Order 05-269667-000, AE FCV-510 and -530 feedwater flow control valve controllers

- STS AL-102, “MDAFW Pump B Inservice Pump Test,” Revision 31

- STS AL-103, “Turbine-Driven AFW Pump Inservice Pump Test,” Revision 38

- STS AL-201C, “Turbine-Driven Auxiliary Feedwater System Inservice Valve Test,” Revision 1

- STS EG-100A, “Component Cooling Water Pumps A/C Inservice Pump Test,” Revision 20

- STS EJ-100A, “RHR System Inservice Pump A Test,” Revision 29

- STS EJ-209A, “Train A RHR System Inservice Valve Test,” Revision 0

- SYS KJ-123, “Post Maintenance Run of Emergency Diesel Generator A,” Revision 28

- SYS KJ-12, “Post Maintenance Run of Emergency Diesel Generator B,” Revision 26

- Work Orders 03-253909-006, 03-256152-014, 04-258534-005, 04-263258-000, 04-265347-002, 04-265350-002, 04-265914-002, 04-266147-000, 04-263621-000, 04-267263-000, 04-267525-000, 04-267525-001, 04-267543-000, 04-267544-000, 04-267716-001, 04-267734-001, 04-267-869-001, and 04-269023-001