UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

October 4, 2000

Otto L. Maynard, President and
Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, Kansas 66839

SUBJECT: WOLF CREEK GENERATING STATION--NRC INTEGRATED INSPECTION REPORT NO. 50-482/00-08

Dear Mr. Maynard:

The NRC conducted inspections on August 13 through September 30, 2000, at your Wolf Creek Generating Station. The enclosed report presents the results of these inspections. The results of these inspections were discussed during meetings on September 1 and 29, 2000, with Messrs. C. Younie and B. McKinney, respectively, and other members of your staff.

These inspections were an examination of 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. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of these inspections, the NRC has identified two issues that were evaluated under the risk significance determination process as having very low safety significance (green). The NRC has also determined that a violation is associated with one of these issues. This violation is being treated as a noncited violation (NCV), consistent with Section VI.A of the NRC Enforcement Policy. This NCV is described in the subject inspection report. If you contest the violation or significance of the NCV, you should provide a response within 30 days of the date 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, U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Wolf Creek Generating Station facility.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.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/***

William D. Johnson, Chief
Project Branch B
Division of Reactor Projects

Docket No.: 50-482
License No.: NPF-42

Enclosure:
NRC Inspection Report No.
50-482/00-08

cc w/enclosure:
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Only inspection reports to the following:
David Diec **(DTD)**
NRR Event Tracking System **(IPAS)**
WC Site Secretary **(SLA2)**
Dale Thatcher **(DFT)**

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| RIV:SRI:DRP/B | RI:DRP/B | PE:DRP/B | DRS/PSB | SRI:DRP/B |
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**ENCLOSURE**

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

| | |
|---|---|
| Docket Nos.: | 50-482 |
| License Nos.: | NPF-42 |
| Report No.: | 50-482/00-08 |
| Licensee: | Wolf Creek Nuclear Operating Corporation |
| | Wolf Creek Generating Station |
| Location: | 1550 Oxen Lane NE<br>Burlington, Kansas |
| Dates: | August 13 through September 30, 2000 |
| Inspectors: | F. L. Brush, Senior Resident Inspector<br>J. S. Dyke, Resident Inspector<br>V. G. Gaddy, Senior Resident Inspector, Callaway Plant<br>J. D. Hanna, Resident Inspector, Callaway Plant<br>R. V. Azua, Project Engineer<br>M. P. Shannon, Senior Health Physicist<br>D. R. Carter, Health Physicist |
| Approved By: | W. D. Johnson, Chief, Project Branch B |

ATTACHMENTS:
1. Supplemental Information
2. NRC's Revised Reactor Oversight Process

SUMMARY OF FINDINGS

Wolf Creek Generating Station
NRC Inspection Report No. 50-482/00-08

IR500482-00-08; on 8/13-9/30/2000; Wolf Creek Nuclear Operating Corporation; Wolf Creek Generating Station. Integrated Resident/Regional Report. As low as reasonably achievable (ALARA) Planning and Controls

The report covers a 7-week period of resident inspection and announced inspections by Region IV inspectors. The significance of issues is indicated by their color (green, white, yellow, red) and was determined by the significance determination process in Inspection Manual Chapter 0609.

**Cornerstone: Occupational Radiation Safety**

- Green. On August 28, 2000, the inspectors identified that radiation protection personnel failed to perform a contamination survey of an area containing scaffolding located in the residual heat exchanger Room A prior to workers entering the area on August 9, 2000. 10 CFR Part 20, Section 1501(a), states, in part, each licensee shall make or cause to be made surveys that are reasonable under the circumstances to evaluate concentrations or quantities of radioactive material and the potential radiological hazards. The failure to perform a contamination survey of the above area was a violation of 10 CFR Part 20, Section 1501(a). This violation is being treated as a noncited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. This issue is in the licensee's corrective action program as Performance Improvement Request 2000-2403.

  This violation was determined to have very low safety significance, because there was no overexposure or substantial potential for an overexposure to occur (Section 2OS2).

- Green. During the review of the licensee's Refueling Outage 10 exposure estimates and exposure performance data, the inspectors identified that Radiation Work Permit 99-4200 (secondary side steam generator work) total person-rem exceeded budgeted person-rem by greater than 50 percent (11.9 rem verses 6.6 rem). The inspectors noted that approximately 2 person-rem of this additional exposure was due to foreign object retrieval work, which was not planned during Refueling Outage 10. Although retrieval work was not necessary during Refueling Outage 9, it had been performed during previous refueling outages. The failure to plan/budget for the retrieval operation caused the licensee to exceed its budgeted estimate by greater than 50 percent. This issue is in the licensee's corrective action program as Performance Improvement Request 2000-2430.

  This issue was determined to have very low-safety significance, because actual job dose was less than 25 person-rem and there was only one occurrence (Section 2OS2).

## Report Details

### Summary of Plant Status

The plant operated at essentially 100 percent power for the report period, with the following exceptions. On September 4, 2000, the plant tripped when a squirrel shorted out a capacitor bank on the unit auxiliary transformer. The licensee returned the plant to service on September 7, 2000, and 100 percent power on September 11. On September 15, 2000, the unit began the power coastdown prior to Refueling Outage 11 which started on September 30.

### 1. REACTOR SAFETY
**Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness**

### 1R04 Equipment Alignment (71111.04)

a. Inspection Scope

The inspectors performed a partial walkdown of essential service water Train A during a maintenance outage of essential service water Train B. In addition, the inspectors performed a complete walkdown of the component cooling water system Train B to verify equipment alignment and identify discrepancies that could impact redundant system operability. The inspectors used the following procedures and information to perform the walkdowns:

- STS EF-001, "Essential Service Water Valve Check," Revision 8
- STS EG-001, "Component Cooling Water Valve Check," Revision 10
- SYS EG-400, "Component Cooling Water System Fill and Vent," Revision 9
- M-10EG (Q), System description for component cooling water
- Operations Information Report 95EG002, "Sluicing Between Component Cooling Water Trains"
- Listing of open work order descriptions for the component cooling water system
- Essential Drawing M-K2EF01, "Piping and Instrumentation Diagram Essential Service Water," Revision 42
- Essential Drawing M-12EG01, "Piping and Instrumentation Diagram Component Cooling Water System," Revision 11
- Essential Drawing M-12EG02, "Piping and Instrumentation Diagram Component Cooling Water System," Revision 14
- Essential Drawing M-12EG03, "Piping and Instrumentation Diagram Component Cooling Water System," Revision 05

b. Findings

There were no findings identified.

1R05 Fire Protection (71111.05)

a. Inspection Scope

The inspectors performed a walkdown of the following areas to determine that the licensee implemented a fire protection program that properly controlled combustibles, that maintained the fire detection and suppression equipment and passive fire protection features, and that adequately compensated for inoperable or degraded fire protection equipment, systems, or features:

- Fuel building 2000 foot, fuel pool cooling heat exchanger Rooms A and B
- Control building 2016 foot, Class 1E air conditioning equipment room, Trains A and B
- Essential service water pump Rooms A and B

b. Findings

There were no findings identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors reviewed the licensee's maintenance rule implementation for the following equipment to assess the effectiveness of maintenance efforts that apply to scoped structures, systems, and components:

- 345 kV Rose Hill Breakers 345-40 and 345-50
- Control Bank D control rods
- Service water Pump A
- Reactor protection system
- Engineered safety features actuation system

The inspector's review included various maintenance rule information.

b. Findings

There were no findings identified.

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

a. Inspection Scope

The inspectors reviewed the licensee's risk assessment for equipment outages as a result of planned and emergent maintenance to evaluate the licensee's effectiveness in assessing risk for planned and emergent maintenance. The inspectors also discussed the planned and emergent work activities with planning and maintenance personnel. The inspectors review included the following:

- Operational risk assessments for planned maintenance for the weeks of August 14 and September 4 and 18, 2000.
- Actual, planned, and emergent work schedules for the same weeks

The inspectors also reviewed the following documents:

- Procedure AP 22C-003, "Operational Risk Assessment," Revision 5

b. Findings

There were no findings identified.

1R14 Personnel Performance During Nonroutine Plant Evolutions (71111.14)

a. Inspection Scope

The inspectors reviewed operator response to a reactor trip due to a fire in the unit auxiliary transformer on September 2, 2000, which required more than a routine operator response during a plant transient. A squirrel caused a fault on the auxiliary transformer output. Two reactor coolant pumps, a circulating water pump, a heater drain pump, and a condensate pump tripped on undervoltage. A pressurizer power-operated relief valve lifted once when pressurizer spray was lost due to the lack of driving flow when reactor coolant Pump D tripped.

b. Findings

There were no findings identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following operability evaluations to ensure that operability was properly justified and the component or system remained operable:

- O-ring leakage on main steam isolation Valve AB-HV-11 red train accumulator

- Component cooling water containment isolation Valve EG-HV-60
- Operating the plant at 100 percent power on the unit startup transformer

The inspectors also discussed the evaluations with licensee personnel and reviewed applicable portions of the Updated Safety Analysis Report and control room logs.

b. Findings

There were no findings identified.

1R16 Operator Workarounds (71111.16)

a. Inspection Scope

The inspectors reviewed the cumulative effects of existing operator workarounds on the reliability, availability, and potential for misoperation of a system, its potential for increasing the frequency of an initiating event that could affect multiple mitigating systems, and the effects on operators' ability to respond in a correct and timely manner to plant transients and accidents.

b. Findings

There were no findings identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

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

- Motor-driven auxiliary feedwater Pump B
- SYS EJ-120, "Startup of A Residual Heat Removal Train," Revision 37
- Work Order 00-218801-000, Residual heat removal pump motor oil sample, megger, and polarization index testing
- Emergency diesel Generator B, intercooler heat exchanger
- Work Order 00-218596-002, Postmaintenance testing of EKJ06B, emergency diesel Generator B intercooler heat exchanger

b. Findings

There were no findings identified.

1R20 Refueling and Outage Activities (71111.20)

a. Inspection Scope

The inspectors reviewed the outage risk control plan to verify that the licensee considered appropriate risk, industry experience, and previous site problems. The inspectors also discussed the outage risk assessment with licensee personnel.

b. Findings

There were no findings identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

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

- STN PE-004 Charcoal absorber in-place leak test nonsafety-related units
- STS EF-100B Essential service water system inservice Pump B and essential service water Pump B/service water cross-connect valve test
- STS EN-205 Containment spray system inservice valve test
- STS IC-201A Analog channel operational test of average temperature (Tavg), differential temperature and pressurizer pressure protection Set 1
- STS IC-600B Slave relay test Train B block tests
- STS IC-615A Slave relay Test K615 Train A safety injection
- STS IC-644A Slave relay Test K644 Train A containment spray
- STS IC-644B Slave relay Test K644 Train B containment spray
- STS KJ-015A Manual/Auto fast start, synchronization and loading of emergency diesel Generator NE01

b. Findings

There were no findings identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors reviewed Temporary Modification 00-011-FP, alternate power supply to the motor-driven fire pump automatic controller, to verify that the modifications have not affected the safety functions of important systems.

b. Findings

There were no findings identified.

## 2. RADIATION SAFETY
**Cornerstone: Occupational, Public**

2OS2 ALARA Planning and Controls (7112102)

a. Inspection Scope

The inspectors interviewed radiation workers and radiation protection personnel throughout the radiological controlled area and conducted independent radiation surveys of selected work areas. The following items were reviewed to determine whether the licensee has an adequate program to maintain occupational exposures as low as is reasonably achievable (ALARA):

- ALARA program procedures
- Radiation protection quality evaluation Audit K-520 and ALARA self-assessment Audit SEL99-32
- Processes used to estimate and track exposures
- Plant collective exposure history for the past 3 years, current exposure trends, and 3-year rolling average dose information
- Three radiation work permit packages from the outage work activities which resulted in the highest personnel collective exposures during the inspection period
- Use of engineering controls to achieve dose reductions, including temporary shielding
- Individual exposures of selected work groups (operations and mechanical maintenance)
- Hot spot tracking and reduction program

- Plant related source-term data, including source-term control strategy
- Radiological work planning
- A summary of ALARA related performance improvement requests written since August 1, 1999, were reviewed. Fourteen of these performance improvement requests were reviewed in detail.
- Declared pregnant worker dose monitoring controls
- Job site inspections and ALARA control. No work was performed in high exposure or high radiation areas during this inspection. Therefore, this aspect of the above procedure could not be verified.

b. Findings

1. Failure to Perform a Contamination Survey

During a tour of the radiological controlled area on August 28, 2000, the inspectors identified a ladder leading to erected scaffolding located in residual heat exchanger Room A located on the 2000-foot elevation of the auxiliary building. No radiological information was attached to the ladder. On July 13, 2000, radiation protection personnel performed a radiation survey of the area. However, a contamination survey was not performed prior to workers entering the area on August 9, 2000. The licensee performed a contamination survey of the area on August 29, 2000, and identified no contamination.

10 CFR Part 20, Section 1501(a), states, in part, each licensee shall make or cause to be made surveys that are reasonable under the circumstances to evaluate concentrations or quantities of radioactive material and the potential radiological hazards. The failure to perform a contamination survey of the above area was a violation of 10 CFR Part 20, Section 1501(a). When this violation was processed through the occupational radiation safety significance determination process, it was determined to be a “green” finding and to have very low safety significance, because there was no overexposure or substantial potential for an overexposure to occur. This violation is being treated as a noncited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. This violation is in the licensee’s corrective action program as Performance Improvement Request 2000-2403 (50-482/0008-01).

2. Poor Radiological Work Planning

During the review of the licensee’s Refueling Outage 10 exposure estimates and exposure performance data, the inspectors identified Radiation Work Permit 99-4200 (secondary side steam generator work) total person-rem exceeded budgeted person-rem by greater than 50 percent (11.9 rem verses 6.6 rem). The licensee provided to the inspectors justification that the scope of the job had increased, which accounted for approximately 2.5 person-rem of the additional exposure. This increase in job scope

was due to foreign object retrieval problems on steam Generator A, hand hole pitting problems, and increased sludge lancing on the steam Generator C.

The inspectors noted that approximately 2 person-rem of this additional exposure was due to foreign object retrieval work, which was not planned/budgeted during Refueling Outage 10. The inspectors were informed that retrieval work was not necessary during Refueling Outage 9. However, the inspectors noted that retrieval work had been performed during seven of the previous nine refueling outages. The failure to plan/budget for the retrieval operation caused the licensee to exceed its budgeted estimate by greater than 50 percent.

When this issue was processed through the occupational radiation safety significance determination process, it was determined to be a green finding and to have very low-safety significance because actual job dose was less than 25 person-rem and there was only one occurrence. This issue is in the licensee's corrective action program as Performance Improvement Request 2000-2430.

## 4. OTHER ACTIVITIES

### 4OA5 Meetings

#### .1 Exit Meeting Summary

The inspectors presented the inspection results of the radiation protection inspection to Mr. C. Younie, Manager Operations/Acting Plant Manager, and other members of licensee management at the conclusion of the inspection on September 1, 2000. The licensee acknowledged the findings presented.

The inspectors presented results of the resident inspection to Mr. B. McKinney and other members of licensee management after the conclusion of the inspection on September 29, 2000.

The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT 1

Supplemental Information

PARTIAL LIST OF PERSONS CONTACTED

Licensee

K. A. Harris, Manager, Regulatory Affairs
J. W. Johnson, Manager, Resource Protection
O. L. Maynard, President and Chief Executive Officer
B. T. McKinney, Vice President Plant Operations and Plant Manager
R. Muench, Vice President Engineering and Information Services
S. R. Koenig, Manager, Performance Improvement and Assessment
C. C. Warren, Vice President Operations Support

ITEMS OPENED AND CLOSED

Opened

| | | |
|---|---|---|
| 50-482/0008-01 | NCV | Failure to perform a contamination survey (Section 2OS2) |

Closed

| | | |
|---|---|---|
| 50-482/0008-01 | NCV | Failure to perform a contamination survey (Section 2OS2) |

LIST OF DOCUMENTS REVIEWED

Fire Protection

- FPP F-2 Fuel building 2000 foot, ‘B’ fuel pool cooling heat exchanger room
- FPP F-3 Fuel building 2000 foot, ‘A’ fuel pool cooling heat exchanger room
- FPP ESW-1 Essential service water pump Room A
- FPP ESW-2 Essential service water pump Room B
- Updated Safety Analysis Report Sections 9.5B, C.13.1, and C.14.1
- Essential Drawing 10466-A-1802, "Architectural Fire Delineation Floor Plan Elevation 2000'-0"

Maintenance Rule Documents

- Final scope evaluation for control Bank D control rods
- Final scope evaluation for service water Pump A
- Functional failure determination checklist for 345 kV rose hill breaker
- Functional failure determination checklist for control Bank D control rods
- Functional failure determination checklist for service water Pump A
- Functional failure determination checklist for SA-01 - engineered safety features actuation system
- Functional failure evaluations for SB, reactor protection system
- Maintenance rule bases information, SB, reactor protection system
- Maintenance rule bases information, engineered safety features actuation system
- Maintenance rule expert panel meeting Minutes SA-01 through SA-13 - engineered safety features actuation system
- Maintenance rule expert panel meeting minutes for SB, reactor protection system
- Maintenance rule performance evaluation for SA-01 - engineered safety features actuation system
- Maintenance rule performance evaluation for SA-11 - engineered safety features actuation system
- Maintenance rule performance evaluations for SA-13 - engineered safety features actuation system
- Maintenance rule performance evaluation for SB, reactor protection system
- Performance Improvement Request 2000-2122
- Unavailability data for SB, reactor protection system

Operability Evaluations

- Calculation Change Notice XX-E-006-004-CN003, Evaluation the effect of using the start-up and No. 7 transformers for power generation
- STS EG-201B, Component cooling water system Train B inservice valve test

- Temporary Modification 00–14-MA, XMA02 unit auxiliary transformer and XMR01 startup transformer
- "Unreviewed Safety Question Determination and Regulatory Screening 59-00-0052," Revision 0
- Work Order 00-220450-000, Troubleshoot component cooling water containment isolation Valve EG-HV-60
- Work Order 00-220450-001, Replace component cooling water containment isolation Valve EG-HV-60 motor control center breaker contact
- Work Order 00-220450-001, Troubleshoot component cooling water containment isolation Valve EG-HV-60 motor control center breaker

Radiation Safety

Procedures

- AP 25A-001 "Radiation Protection Manual," Revision 6
- AP 25A-401 "ALARA Program," Revision 3
- AP 25A-410 "ALARA Committee," Revision 4
- AP 25A-700 "Use of Temporary Lead Shielding," Revision 4

ALARA Work Packages

- Primary side steam generator work (RWPs 99-3220 and 00-3220)
- Secondary side steam generator work (RWPs 99-4200 and 00-4200)
- Scaffolding work inside the radiological controlled area (RWPs 99-4420 and 00-4420)

Performance Improvement Requests

- 1999-2711, -2712, -3101, -3344, -3658, -3816, -3888, and -3949
- 2000-0265, -0904, -0931, -0935, -1643, and -1750

ATTACHMENT 2

# NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

| Reactor Safety | Radiation Safety | Safeguards |
|---|---|---|
| ● Initiating Events | ● Occupational | ● Physical Protection |
| ● Mitigating Systems | ● Public | |
| ● Barrier Integrity | | |
| ● Emergency Preparedness | | |

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the significance determination process, and assigned colors of GREEN, WHITE, YELLOW, or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, or RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.99