

Docket No. STN 50-482/90-31
License No. NPF-42

DEC 7 1990

Wolf Creek Nuclear Operating Corporation
ATTN: Bart D. Withers
President and Chief Executive Officer
P.O. Box 411
Burlington, Kansas 66839

Gentlemen:

Thank you for your letter of November 16, 1990, in response to our letter and Notice of Violation dated October 19, 1990. We have reviewed your reply to Violation 482/9031-01 and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,
Thomas F. Gwynn



Samuel J. Collins, Director
Division of Reactor Projects

cc:
Wolf Creek Nuclear Operating Corp.
ATTN: Gary Boyer, Plant Manager
P.O. Box 411
Burlington, Kansas 66839

Shaw, Pittman, Potts & Trowbridge
ATTN: Jay Silberg, Esq.
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Washington, D.C. 20036

Public Service Commission
ATTN: Chris R. Rogers, P.E.
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P.O. Box 360
Jefferson City, Missouri 65102

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Wolf Creek Nuclear Operating
Corporation

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U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Wolf Creek Nuclear Operating Corp.
ATTN: Otto Maynard, Manager
Regulatory Services
P.O. Box 411
Burlington, Kansas 66839

Kansas Corporation Commission
ATTN: Robert Elliot, Chief Engineer
Utilities Division
4th Floor - State Office Building
Topeka, Kansas 66612-1571

Office of the Governor
State of Kansas
Topeka, Kansas 66612

Attorney General
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Topeka, Kansas 66612

Chairman, Coffey County Commission
Coffey County Courthouse
Burlington, Kansas 66839

Kansas Department of Health
and Environment
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ATTN: Gerald Allen, Public
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bcc to DMB (IE01)

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WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
Vice President
Nuclear Operations

November 16, 1990

NO 90-0287

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

Reference: Letter dated October 19, 1990 from S. J. Collins,
NRC to E. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Violation 482/9031-01

Gentlemen:

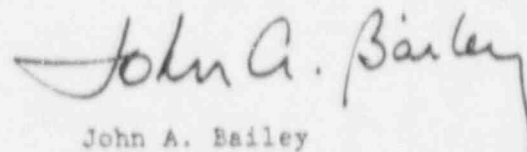
Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) response to violation 482/9031-01 which is documented in the Reference. Violation 482/9031-01 concerned the failure to have an approved procedure. The Reference also transmitted violation 482/9031-02 concerning the failure to take adequate corrective action and requested additional information regarding the overall actions to correct the apparent continuing work control problem and an assessment of the effectiveness of the corrective action program at Wolf Creek Generating Station. The response to this portion of the Reference will be provided as established with Mr. A. T. Howell, NRC.

As a result of discussions on November 14, 1990, between Mr. A. T. Howell, NRC, and Mr. H. K. Chernoff, WCNOG, concerning the similarities of three NRC requested responses to NRC violations and concerns, it was agreed that WCNOG will provide a combined response to these items by December 7, 1990. This submittal will provide a response to the remaining items requested in Inspection Report 482/9031 and the response to violation 482/9034-02, concerning the failure of the corrective action program to ensure that hardware failures and nonconforming conditions are evaluated to assure equipment operability. Additionally, this submittal will provide the information verbally requested on November 12, 1990 by Mr. A. T. Howell, NRC, concerning WCNOG's previously submitted response to violation 482/9028-01.

NO 90-0287
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If you have any questions concerning this matter please contact me or
Mr. H. K. Chernoff of my staff.

Very truly yours,



John A. Bailey
Vice President
Nuclear Operations

JAB/aem

cc: A. T. Howell (NRC), w/a
R. D. Martin (NRC), w/a
D. V. Pickett (NRC), w/a
M. E. Skow (NRC), w/a

Violation (482/9031-01): Failure to Have an Approved Procedure

Finding: Technical Specification 6.8.1 requires approved written procedures for activities affecting safety. WCGS administrative Procedure ADM 07-100, Revision 45, "Approval and Distribution of WCGS Procedures," paragraph 4.3.1, requires, in part, that Revision 0 of nonnuclear safety-related procedures be approved by the plant safety review committee (PSRC) to ensure the procedure is appropriately classified and that it receive plant manager approval signature.

Contrary to the above, on May 16, 1990, a test of the main generator voltage regulator was performed without a procedure which had been approved by the PSRC and did not receive the plant manager approval signature.

Reason For Violation:

The reason for the violation was the failure of the personnel involved to recognize the adjustment of the main generator voltage regulator as a special test requiring an approved procedure in accordance with ADM 07-100, "Preparation, Review, Approval and Distribution of WCGS Procedures". Upon initiation of Work Request No. 01379-87, Maintenance Engineers determined that the adjustment was a nonnuclear safety-related activity and that work request instructions were adequate for this activity. This determination was based on the failure to recognize the significance of the activity on plant operation and the effect on safety-related equipment.

Corrective Steps Which Have Been Taken And Results Achieved:

Operations and Maintenance Management have reviewed recent events related to inadequate work control practices and determined that work on equipment in service will be performed under procedural controls. Under special circumstance the requirement to have a procedure for the work activity may be waived with the approval of both the Manager Operations and Manager Maintenance and Modifications. Proceduralizing work activities on in service equipment ensures that appropriate reviews are performed to determine the effect of activities on plant operation and safety-related equipment.

A review of the preventative maintenance (PM) activities was performed to identify those activities that require the equipment to be in service while conducting the PM. Procedures are being developed and will be in place prior to the performance of the PM activity. For corrective maintenance activities on equipment in service procedures are developed as the need arises.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

In order to formalize the above process, procedure ADM 08-201, "Control of Maintenance and Modifications" is being revised to incorporate the use of procedures for performing maintenance activities on equipment in service.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by December 3, 1990 with the revision to ADM 08-201, which will require the use of procedures when performing preventative and corrective maintenance work activities on equipment that is in service.