

APPENDIX A

NOTICE OF VIOLATION

Wolf Creek Nuclear Operating Corporation
Wolf Creek Generating Station

Docket: 50-482
License: NPF-42

During an NRC inspection conducted on April 4-8, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1.b requires that written procedures be established, implemented, and maintained covering the emergency operating procedures required to implement the requirements of NUREG 0737, "Clarification of TMI Action Plan Requirements," and Supplement 1 to NUREG-0737 as stated in Generic Letter 82-33, "Supplement 1 to NUREG 0737, Requirements For Response Capabilities," Section 7.1.

Procedure AP 35-001, "Procedure Writer's Guide," Revision 2, Section 6.6.2, states that a background document shall be written and maintained for all emergency operating procedures.

Procedure ADM 01-052, "Emergency Procedure Generation Package," Revision 5, Section 6.2.5, states that the technical basis for each emergency operating procedure shall be described in a background document. Section 6.3.7 of ADM 01-052 states that justification for each deviation from the generic technical guidelines shall be documented in a background document or data package for the procedure. Section 6.3.8 states that justification for each safety significant deviation from the generic technical guideline shall clearly describe why this deviation is necessary on a plant-specific basis.

Contrary to the above, the licensee failed to justify each deviation from the generic technical guidelines and document these justifications in a maintained background document or data package for Revision 4 of the emergency operating procedures.

This is a Severity Level IV violation (Supplement I) (482/9404-01).

- B. Technical Specification 6.8.1.b requires that written procedures be established, implemented, and maintained covering the emergency operating procedures required to implement the requirements of NUREG 0737, "Clarification of TMI Action Plan Requirements," and Supplement 1 to NUREG-0737 as stated in Generic Letter 82-33, "Supplement 1 to NUREG 0737, Requirements For Response Capabilities," Section 7.1.

Procedure ADM 01-052, "Emergency Procedure Generation Package," Revision 5, Section 6.4.3, states emergency operating procedure verification shall be performed by subject matter experts designated by the Operations Manager. Section 6.4.5 states that each reviewer shall

evaluate the procedure against the verification criteria provided in Attachment A. Attachment A required the reviewer to determine if all emergency operating procedure local operator actions were capable of being performed under worst case environmental conditions (radiation levels, steam, flooding, toxic gases, and lighting levels.)

Contrary to the above, the licensee failed to designate an appropriate subject matter expert and adequately assess the effects of radiation levels on the ability to perform local operator actions called for in Revision 4 of the emergency operating procedures.

This is a Severity Level IV violation (Supplement I) (482/9404-02).

- C. Technical Specification 6.8.1.b requires that written procedures be established, implemented, and maintained covering the emergency operating procedures required to implement the requirements of NUREG 0737, "Clarification of TMI Action Plan Requirements," and Supplement 1 to NUREG-0737 as stated in Generic Letter 82-33, "Supplement 1 to NUREG 0737, Requirements For Response Capabilities," Section 7.1.

Contrary to the above, EMG FR-H1, "Response to Loss of Secondary Heat Sink," Revision 4, was not maintained, in that Step 56 was inadvertently omitted from the procedure.

This is a Severity Level IV violation (Supplement I) (482/9404-03).

Pursuant to the provisions of 10 CFR 2.201, Wolf Creek Nuclear Operating Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas
this 19th day of May 1994