

APPENDIX A

NOTICE OF VIOLATION

Kansas Gas and Electric Company
Wolf Creek Generating Station

Docket: STN 50-482/82-22
License: CPPR-147

Based on the results of an NRC inspection conducted December 1-31, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violations were identified.

1. Failure to Properly Follow Procedures

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by instructions or procedures, and shall be accomplished in accordance with these instructions or procedures.

The receiving and maintenance instructions for the steam generators (RMI-W-120) and the pressurizer (RMI-W-130) both require monthly inspection and paint (carboline) touch up as needed.

Contrary to the above, the required paint touch up has not been performed for the steam generators or the pressurizer since October 1980.

This is a Severity Level V Violation. (Supplement II)
(482/8222-02)

2. Inadequate Quality Records

10 CFR Part 50, Appendix B, Criterion XVII requires, in part, "Sufficient records shall be maintained to furnish evidence of activities affecting quality. These records shall include at least the results of ... inspections, tests ..."

Work Procedure WP-I-01, Revision 11 requires completion and sign off of the "Equipment Maintenance Log" upon completion of work activity.

Contrary to the above, from February 1, 1980, until August 19, 1980, and again from January 25, 1982, through September 20, 1982, there are no records of performance of required maintenance or inspections of the pressurizer and no records of inerting gas pressure.

This is a Severity Level V Violation. (Supplement II)
(482/8222-03)

3. Inadequate Corrective Action

10 CFR Part 50, Appendix B, Criterion XVI requires that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by instructions or procedures, and shall be accomplished in accordance with these instructions or procedures.

Daniel International Corporation (DIC) Administrative Procedure AP-VI-12, "Corrective Action," requires the responsible managers to perform the corrective action as specified in the corrective action report.

Contrary to the above, in November 1981, the problem of inadequate maintenance requirements was identified in a Quality Engineering Surveillance Report. This problem was the subject of a Corrective Action Report (CAR) Number 1G0011 of November 17, 1981. Corrective action included a review of all records of completed maintenance and a review of all Receiving and Maintenance Instructions (RMI's) to assure compliance with all vendor requirements. These reviews were completed on November 29, 1982. Review of present RMI's and maintenance records show completion of these corrective actions to be inadequate.

This is a Severity Level IV Violation. (Supplement II)
(482/8222-04)

Pursuant to the provisions of 10 CFR 2.201, Kansas Gas and Electric Company is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: February 23, 1983