

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Neil S. "Buzz" Carns  
Chairman, President and  
Chief Executive Officer

June 13, 1994

WM 94-0082

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

Reference: Letter NO 90-0287, dated November 16, 1990, from  
J. A. Bailey, WCNOG, to NRC  
Subject: Docket No. 50-482: Revision to NRC Commitment  
Made in WCNOG's Response to Violation 482/9031-01

Gentlemen:

The purpose of this letter is to advise the NRC of a revision to a commitment made in the Reference. The Reference provided Wolf Creek Nuclear Operating Corporation's (WCNOG) response to Violation 482/9031-01. This response addressed a violation of Technical Specification 6.8.1, which requires approved written procedures for activities affecting safety. Specifically, the violation documented the performance of a test of the main generator voltage regulator without a procedure that had been approved by the Plant Safety Review Committee or the plant manager. In response to the violation, WCNOG committed to require the use of procedures when performing preventative and corrective maintenance work activities on equipment that is in service. Procedure ADM 08-201, "Control of Maintenance and Modifications," was revised to state that "Procedures shall be developed and used for both Preventive and Corrective Work Activities on systems/components which are in service."

This commitment has been changed, in part, to implement the "Minor Maintenance" philosophy. This change allows the performance of "Minor Maintenance" utilizing a more streamlined process than the normal Work Request process. "Minor Maintenance" is defined, in part, as corrective work actions for deficiencies on components or parts, without the use of a written procedure, where the component or part does not perform or affect: a safety-related function, an environmental qualification function, a seismic function, or quality assurance programs for the ASME NPT or National Board NR and R Certificates of Authorization. Therefore, the use of the "Minor Maintenance" philosophy could allow preventative and corrective work activities on systems/components which are in service without the use of a procedure.

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1 / Burlington, KS 66839 / Phone (316) 364-8831

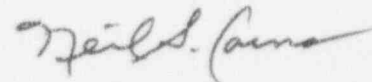
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The NRC Violation was issued based on the fact that testing was being conducted on safety-related equipment without a properly reviewed and approved procedure. Administrative controls are in place which address the fact that "Minor Maintenance" can not be performed on any component or part that performs or affects any safety-related function, or affects the ability of safety-related components to operate as designed. Also, the Shift Supervisor/Control Room is required to be notified prior to the performance of work if the work activity could change control board indications or cause an unexpected alarm. Therefore, there are adequate administrative controls in place to ensure that "Minor Maintenance" is not performed on components or parts that could affect safety-related components.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4000, or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,



Neil S. Carns

NSC/jra

cc: L. J. Callan (NRC)  
G. A. Pick (NRC)  
W. D. Reckley (NRC)  
T. Reis (NRC)