APPENDIX

NOTICE OF VIOLATION

Wolf Creek Nuclear Operating Corporation
Wolf Creek Generating Station

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

During an NRC inspection conducted from July 14 through August 2, 1991, three 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. Inadequate Procedure

Technical Specification (TS) 6.8.1.a states "Written procedures shall be established, implemented, and maintained covering the activities in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Paragraph 5 of Appendix A requires that procedures for abnormal, offnormal, or alarm conditions be written for safety-related annunciators, which should normally contain: (1) the meaning of the annunciator; (2) the source of the signal, (3) the immediate action that is to occur automatically; (4) the immediate operator action, and (5) their long-range action. This is accomplished, in part, by Alarm Response Procedure ALR 00-128C, "TD AFP BRG OIL TEMP HI."

10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances.

Contrary to the above, during an NRC inspection conducted from July 14 through August 2, 1991, ALR 00-128C was determined to be inappropriate to the circumstances for immediate and long-range operator action. The procedure incorrectly referenced the instrumentation to be used in determining the immediate and long-range actions. The computer points referenced in ALR 00-128C to be used to monitor the turbine-driven auxiliary feedwater pump (TDAFWP) lube oil temperature, actually sensed the inner and outer bearing temperatures. The alarm response procedure required that the TDAFWP be shutdown if a high lube oil temperature was reached. Therefore, the reactor operator would have been required to shut down the TDAFWP prior to reaching an actual high lube oil temperature. The lube oil cooler outlet temperature limits, requiring shutdown of the TDAFWP during emergency and nonemergency operation, can only be determined locally at the cooler. No guidance was provided in ALR 00-128C and no reference was made as to which local temperatures should be monitored during TDAFWP operation.

This is a Severity Level IV violation. (Supplement I) (482/91202-01)

B. Failure to Follow a Radiological Control Procedure

TS 6.11, "Radiation Protection Program," requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and

adhered to for all operations involving personnel radiation exposure. This is accomplished, in part, by Administrative Procedure ADM 03-002, "Radiation Worker Guidelines."

ADM 03-002, paragraph 5.6. requires that upon exiting the radiological control area, at access control, an individual will perform a whole-body frisk.

Contrary to the above, on July 24, 1991, a radiation protection technician failed to perform a whole body frisk upon exiting the radiological control area, at the access control point.

This is a Severity Level IV violation. (Supplement I) (482/91202-02)

C. Missed TS Surveillance Test

TS 4.0.2 states that "Each surveillance shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified interval." One example of failure to implement the requirement of TS 4.0.2 is noted below:

> TS 3/4.3.2, "Engineered Safety Features Actuation System [ESFAS] Instrumentation," Surveillance Requirement 4.3.2.1, states that "Each ESFAS instrumentation channel and interlock and the automatic actuation logic and relays shall be demonstrated OPERABLE by the performance of the ESFAS instrumentation surveillance requirements specified in Table 4.3-2. Surveillance Requirement 4.3-2.9.c, "Automatic Actuation Logic and Actuation Relays [Balance of Plant (BOP) ESFAS]," is required to be performed in all modes. Each train shall be tested at least every 62 days on a STAGGERED TEST BASIS (one train every 31 days).
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> Contrary to the above, with the plant in Modes 5 and 6, TS Surveillance Requirement 4.3-2.9.c was completed 14 days after the maximum allowable extension of the specified interval. Surveillance Test STS ML-001, Revision 10, "Monthly Surveillance Log," implemented TS Surveillance Requirements 4.3-2.9.c. Surveillance Procedure STS ML-001 was performed on March 17, 1990, and, with the 25 percent extension of the specified interval, was required to be performed again by April 25, 1990. However, the test was not completed until May 9, 1990.

This is a Severity Level IV violation. (Supplement I) (458/91202-03)

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, 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 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 26th day of March 1992