

APPENDIX A

NOTICE OF VIOLATION

Wolf Creek Nuclear Operating Corporation
Wolf Creek Generating Station (WCGS)

Docket: 50-482
License: NPF-42

During an NRC inspection conducted May 16 through June 26, 1991, two 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 (1991), the violations are listed below:

A. Failure to Lock a Valve in Accordance With Procedure

TS 6.8.1 requires that written procedures shall be established including the applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, dated February 1978. Appendix A of RG 1.33 states that equipment control (e.g., locking and tagging) should be covered by written procedures. Administrative Procedure 02-102, "Control of Locked Components Status," Revision 19, Table 1, page 11 of 47, requires that Valve AL-063 be locked open.

Contrary to the above, on June 6, 1991, the inspector found that the locking chain for Valve AL-063 for the turbine driven auxiliary feedwater pump discharge header to Steam Generator "D" could be removed from the handwheel without breaking the green locking tab. The locked component status log indicated that the valve locking device was secured in April 1990.

This is a Severity Level IV violation. (Supplement I) (482/9113-01)

B. Failure to Adequately Implement the Fire Protection Program

TS 6.8.1.h requires that written procedures shall be established, implemented, and maintained covering fire protection program implementation. ADM 13-100, Revision 4, "Fire Protection Program Manual," provides WCGS's fire protection program implementation. The following are examples of the failure to properly implement ADM 13-100:

1. Section 7.3.4 of ADM 13-100 requires that the fire detection instrumentation for each fire detection zone shown in Table 7.3.4 shall be maintained operable whenever equipment protected by the fire detection instrument is required to be operable. Section 7.3.4.3 states that the operability of the fire detection instrumentation shall be demonstrated by testing and surveillance activities. Section 7.3.4.3.1 requires that the operability of accessible fire detection instruments shall be demonstrated at least once per 6 months by the performance of a trip actuating device operational test as detailed in STN FP-815, -816, -817, -817A through -817F, -818 and -819.

Contrary to the above, on May 22, 1991, licensee personnel confirmed that 82 fire detectors listed in Table 7.3.4 had not been calibrated within a 6-month period. The scheduled surveillance frequency for fire detection instruments had been inadvertently changed from every 6 months to annually. The change to an annual test frequency began in July 1988 and encompassed all the fire detection instrument surveillances by July 1989.

2. Section 7.3.4.2 of ADM 13-100 requires: "With more than one-half of the Function A fire detection instruments in any fire zone shown in Table 7.3.4 inoperable or with any Function B fire detection instruments shown in Table 7.3.4 inoperable, or with any two or more adjacent fire detection instruments shown in Table 7.3.4 inoperable, within 1 hour establish a fire watch patrol to inspect the zones with the inoperable instruments at least once per hour, unless the instrument is located inside the containment, then inspect that containment zone once per 8 hours or monitor the containment air temperature at least once per hour at the locations listed in TS 4.6.1.5."

Contrary to the above, on May 22-23, 1991, between 4:30 p.m. and 12:30 a.m., with more than half of the Function A fire detection instruments in fire zones 201-204, 206, and 215-220 (inside containment) shown in Table 7.3.4 inoperable, the licensee did not, within 1 hour, inspect the containment zone once per 8 hours or between 4:30 p.m. and 6:30 p.m. on May 22, 1991, monitor the containment air temperature once per hour at the locations listed in TS 4.6.1.5.

3. Section 7.3.5 of ADM 13-100, Revision 4, "Fire Protection Program Manual," requires, in part, that the Halon system for the control room cable chases shall be maintained operable whenever equipment protected by the Halon system is required to be operable.

Contrary to the above, on May 22, 1991, the inspector discovered that the Halon bottles for the control room cable chases were below the required pressure to ensure adequate suppression capability. The Halon bottles were last weighed and the pressure verified as adequate on January 18, 1991.

This is a Severity Level IV violation. (Supplement I) (482/9113-02)

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 30th day of July 1991