

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 January 26 through March 7, 1992, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy), the violation is listed below:

Failure to Have Appropriate Procedures

Technical Specifications (TS) 6.8.1.a requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances. Three examples of violating this requirement are stated below:

1. RG 1.33, Appendix A, Item 8.b, requires specific procedures for surveillance tests required by the TS. This is accomplished, in part, by Surveillance Technical Specification Procedure STS BG-004, Revision 8, "RCS Inservice Valve Test."

Contrary to the above, during the inspection period of January 26 through March 7, 1992, STS BG-004 was determined to be inappropriate to the circumstances because it did not provide precautions to indicate maximum system pressure while throttling the seal injection throttle valves. As a result, on January 10, 1992, the coolant charging positive displacement pump discharge piping was overpressurized during the performance of this test.

2. RG 1.33, Appendix A, Item 2.j, requires general operating procedures for going from HOT STANDBY to COLD SHUTDOWN, Mode 3 to Mode 5, respectively. This is accomplished by GEN 00-006, Revision 17, "Hot Standby to Cold Shutdown."

Contrary to the above, on February 23, 1992, with the plant in Mode 5, GEN 00-006 was determined to be inappropriate to the circumstances because it did not provide adequate guidance for closing the safety injection cold leg injection valve, EM HV-8835. As a result, approximately 12,000 gallons of water drained from the refueling water storage tank to the reactor coolant system before the condition was detected and corrected by an operator.

3. RG 1.33, Appendix A, Item 7.c.(1), requires procedures for the collection, storage, and discharge of gaseous waste. This is accomplished by Procedure SYS HA-200, Revision 8, "Waste Gas System Startup and Shutdown."

Contrary to the above, on March 3, 1992, SYS HA-200 was determined to be inappropriate to the circumstances because it did not provide adequate guidance for placing a gas decay tank on line. As a result, an inadvertent release of gaseous waste occurred in the radwaste building.

This is a Severity Level IV violation. (Supplement 1) (482/9202-G2)

Pursuant to the provisions of 10 CFR Part 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, 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 *9th* day of *April* 1992