

NOTICE OF DEVIATION

Wolf Creek Nuclear Operating Corp.  
Wolf Creek Nuclear Generating Station

Docket No. 50-482  
License No. NPF-42  
EA 91-161

During an NRC inspection conducted November 4-8, 1991, deviations of your commitment to adopt the guidance of NRC Generic Letter 89-10 were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C, (1991), the deviations are listed below:

By letter dated December 26, 1989, the licensee committed to meet the provisions of Generic Letter (GL) 89-10. Paragraph "i" of GL 89-10 established a schedule for the development of the licensee's program description. Supplement 2 to GL 89-10 granted an extension to January 1, 1991, for the development of the program description.

GL 89-10 and Supplement 1 to the GL provided the guidelines for the development of plans and procedures for: performing design basis reviews; performing calculations for motor operated valve (MOV) sizing and switch settings; demonstrating the capabilities of the MOVs; analyzing each MOV failure, justifying corrective actions, and trending MOV failures and corrective actions.

Contrary to the above, as of November 8, 1991:

1. The licensee's GL 89-10 program failed to consider any design basis parameters other than differential pressure in its design basis reviews.
2. The licensee's GL 89-10 program failed to establish a method to properly size MOVs and select switch settings by not considering margins for rate of loading effects or torque switch repeatability; nameplate ratings vice stall ratings of the motors; diagnostic equipment inaccuracies; the performance of diagnostic tests at greater than 100 percent voltage; and, the performance of weak link analyses.
3. The licensee's GL 89-10 program failed to develop procedures for the performance of design basis testing (including design differential pressures and flows), acceptance criteria for the test, and feedback mechanisms.
4. The licensee's GL 89-10 program did not have provisions for periodic verification of MOV operability or post-maintenance testing.
5. The licensee's GL 89-10 program did not have adequate provisions for analyzing MOV failures, for justifying corrective action, and for trending those failures and corrective actions.

Please provide 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, in writing within 30 days of the date of this Notice, the reason(s) for the deviation, the corrective steps which have been taken and the results achieved, the corrective steps which will be taken to avoid further deviations, and the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas  
this 20th day of February 1992