

FEB 26 1992

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

Wolf Creek Nuclear Operating Corporation
ATTN: Bart D. Withers
President and Chief Executive Officer
P.O. Box 411
Burlington, Kansas 66839

Gentlemen:

SUBJECT: NRC INSPECTION REPORT 50-482/91-36 (NOTICE OF VIOLATION)

This letter refers to the inspection conducted by Mr. G. A. Pick, C. J. Paulk, and Ms. L. L. Gundrum of this office during the period December 18, 1991, through January 25, 1992. The inspection included a review of activities authorized for your Wolf Creek Generating Station. At the conclusion of the inspection, the findings were discussed with you and those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations of activities in progress.

An unresolved item is identified in paragraph 5.4 of the report. Further inspection followup is necessary to determine whether centrifugal charging pump recirculation flow is adequate for pump protection and whether the flow meets applicable minimum requirements.

On the basis of the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). Violation A pertains to three examples of failure to have adequate procedures. These examples were identified by your staff or were identified as the result of an event. However, these examples are being cited because, collectively, the circumstances that caused or contributed to the violations have not been adequately addressed. For example, one example pertained to an inadequate General Operating Procedure. Even though the NRC has identified weaknesses in other types of operations department procedures, no broad effort has been undertaken to review the adequacy of such procedures. The other examples resulted from an inadequate procedure change or failure to incorporate a procedure change. These two examples, and an inspector identified weakness of failure to incorporate a relatively large number of procedure changes into a permanent procedure revision are indicative of weaknesses in your procedure change process.

*RIV:RI	*SRI	*DRP/D	*C:DRP/D	D:DRP
LLGundrum:sa	GAPick	WBJones	ATHowell	ABreach
2/24/92	2/24/92	2/24/92	2/24/92	2/26/92

*Previously concurred

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Violation B pertains to two examples of failure to follow procedures. These examples were identified as the result of events. This violation appears to have resulted from inattention to detail during the performance of activities by instrumentation and controls (I&C) personnel. In addition, although not cited, a third and less significant example of failure to follow a General Plant Operating Procedure also resulted in two missed surveillance tests. This violation is potentially significant because the examples represent a departure from the usually high level of surveillance implementation performance (particularly by I&C personnel). We have cited these violations to more fully understand your corrective actions associated with these events that appear to have a common root cause, and encourage you to assess whether there are common underlying causes associated with these performance problems.

Violation C was NRC identified and pertains to one example of failure to take appropriate corrective actions for a condition adverse to quality. In November 1987, an essential service water (ESW) system water hammer event was identified by your staff. Although Nuclear Plant Engineering (NPE) personnel considered that the issue was being actively pursued because there was an open Plant Modification Request (PMR) and an Engineering Evaluation Request (EER) to resolve this condition, the inspectors identified that the significance of this 1988 event was not documented, nor were corrective actions implemented to preclude recurrence. An ESW system water hammer event recurred in November 1991. It is the NRC staff's view that this November 1991 water hammer event could have been precluded had appropriate actions been taken in 1988. In addition, although not cited as a violation, the inspectors identified a second similar issue pertaining to low component cooling water (CCW) system operating temperature that was identified by your staff in 1985, but had not been assessed for significance or corrected even though NPE personnel also considered this issue as being actively pursued because there was an open EER.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The response directed by this letter and the enclosed Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

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Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:

A. B. BEACH

A. Bill Beach, Director
Division of Reactor Projects

Enclosures:

Appendix A - Notice of Violation
Appendix B - NRC Inspection Report
50-482/91-36 w/attachment

cc w/enclosures:

Wolf Creek Nuclear Operating Corp.
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Public Service Commission
ATTN: Chris R. Rogers, P.E.
Manager, Electric Department
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Jefferson City, Missouri 65102

U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Wolf Creek Nuclear Operating Corp.
ATTN: Steven G. Widenian
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Kansas Corporation Commission
ATTN: Robert Elliot, Chief Engineer
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1500 SW Arrowhead Rd.
Topeka, Kansas 66604-4027

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Kansas Department of Health
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Bureau of Air Quality & Radiation
Control
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Kansas Department of Health and Environment
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bcc to DMB (IE01)

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Section Chief (DRP/D)
DRSS-RPEPS
RIV File
MIS System
Project Engineer (DRP/D)
DRS

Resident Inspector
DRP
Section Chief (R111, DRP/3C)
SRI, Callaway, R111
RSTS Operator
Lisa Shea, RM/ALF
Greg Pick, SRI, WC

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