

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 December 18, 1991, through January 25, 1992, 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 (1991) (Enforcement Policy), the violations are listed below:

A. Failure to Have Appropriate Procedures

Technical Specification (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 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."

Step 4.21.2 of GEN 00-006 requires the determination of which centrifugal charging pump (CCP) is to remain operable with the plant operating in Mode 4, and requires that the breakers for the remaining CCP and the positive displacement pump be racked out.

Contrary to the above, on January 6, 1992, with the plant operating in Mode 4, Step 4.2.1.2 was inappropriate to the circumstances because it did not explicitly prevent placing a CCP control switch in the pull-to-lock position. The control switch for CCP A was placed in the pull-to-lock position, which rendered the pump inoperable. CCP B breaker was racked out, and the positive displacement pump was left in operation.

2. RG 1.33, Appendix A, Item 8.b(1)(1), requires procedures for surveillance tests, inspections, and calibrations of the reactor protection system. This is accomplished, in part, by STS IC-235, "Analog Channel Operational Test Nuclear Instrumentation System Intermediate Range N-35 Protection Set I," and STS IC-236, "Analog Channel Operational Test Nuclear Instrumentation System Intermediate Range N-36 Protection Set II."

Section 5.2.4 of STS IC-235 and STS IC-236 provides for the establishment of the intermediate range high level reactor trip setpoints.

Contrary to the above, on January 11, 1992, Section 5.2.4 of STS IC-235 and STS IC-236 was inappropriate to the circumstances because licensee personnel failed to incorporate an approved procedure change into Section 5.2.4. This resulted in the improper establishment of high level reactor trip setpoints for both channels of intermediate range monitors.

3. RG 1.33, Appendix A, Item 8.b, requires specific implementing procedures for each surveillance test, inspection, and calibration listed in the Technical Specifications. This is accomplished, in part, by Procedure STS PE-019E, Revision 6, "RCS Isolation Check Valve Leak Test."

Step 2.16 of STS PE-019E requires that the motor-operated safety injection accumulator isolation valves be manually lifted off of their seat to equalize pressure across the valves, after completion of the respective accumulator discharge check valve test.

Contrary to the above, safety injection accumulator isolation valves could not be lifted off of their closed seats without the potential for motor operator damage because procedure Step 2.16 was inappropriate to the circumstances. Step 2.16 failed to specify that the control switch seal-in circuit be placed in "normal," rather than the "maintain closed" position. As a result, on January 8, 1992, motor operator damage associated with Safety Injection Accumulator Isolation Valve EP HV-8808B occurred when technicians lifted the valve off of its closed seat with its control switch in the "maintain closed" position.

This is a Severity Level IV violation. (Supplement I) (482/9136-01)

B. Failure To Follow Procedures

TS 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of RG 1.33, Revision 2, February 1978. Two examples of violating this requirement are stated below:

1. RG 1.33, Appendix A, Item 8.b(1)(k), requires specific procedures for surveillance tests on control rod operability and scram time tests. This is accomplished by Surveillance Procedure STS RE-007, Revision 5, "Rod Drop Time Measurement."

Step 5.4.22.10 of STS RE-007 requires personnel to reconnect all control rod drive mechanism lift coils in the bank being tested using the lift coil disconnect switches.

Contrary to the above, on January 10, 1992, the lift coil disconnect switches for seven rods in Control Bank B were not reconnected. This resulted in a rod control urgent failure alarm during rod withdrawal on January 12, 1992.

2. RG 1.33, Appendix A, Item 8.b(1)(l), requires procedures for surveillance tests, inspections, and calibrations of the reactor protection system. This is accomplished, in part, by STS IC-507A, Revision 5, "Calibration Steam Line Pressure Transmitters."

Step 5.10.4 o. STS IC-507A requires the isolation of Main Steam Pressure Transmitter AB PT-526.

Contrary to the above, on January 18, 1992, instrumentation and control technicians isolated AB PT-525 instead of AB PT-526. This resulted in a steam generator level transient.

This is a Severity Level IV violation. (Supplement I) (482/9136-02)

C. Inadequate Corrective Actions

Title 10 CFR, Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, in November 1988, a water hammer event that occurred in the essential service water system piping that supplies the containment coolers was identified but not corrected. Engineering Evaluation Request 88-EF-08 was initiated, but the significance of the event was not determined, nor were any corrective actions taken. The water hammer event recurred during the 1991-1992 refueling outage.

This is a Severity Level IV violation. (Supplement I) (482/9136-03)

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 Feb. 1992