

APPENDIX A

NOTICE OF VIOLATION

Wolf Creek Nuclear Operating Corporation
Wolf Creek Generating Station

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

During an NRC inspection conducted May 31 to July 11, 1992, 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 (Enforcement Policy), the violations are listed below:

A. Failure to Properly Implement Procedures

Technical Specification (TS) 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, dated February 1978. RG 1.33, Appendix A, Item 8.b(1) requires procedures for surveillance tests of containment heat and radioactivity removal systems. This is accomplished, in part, by Procedure STS EN-205, Revision 6, "Containment Spray System Inservice Valve Test."

Steps 5.2.4 and 5.2.5 of Procedure STS EN-205 require that Valve EN HV-16 be repositioned closed for stroke-time measurement.

Contrary to the above, on June 3, 1992, during the implementation of Procedure STS EN-205, Steps 5.2.4 and 5.2.5 were not performed. With Valve EN HV-16 open, a direct path was created from the refueling water storage tank to the spray additive tank when a nonlicensed operator began to restore the system to its normal lineup. This resulted in the dilution of the sodium hydroxide concentration of the spray additive tank.

This is a Severity Level IV violation. (Supplement I) (482/9212-01)

B. Failure to Perform TS Surveillance Requirements

Two examples of failure to perform required TS Surveillance Requirements within the specified surveillance intervals are stated below:

1. TS 4.8.1.1.a requires that each diesel generator shall be demonstrated OPERABLE in accordance with the frequency specified in Table 4.8-1, "Diesel Generator Test Schedule." Table 4.8-1 specifies that, with the number of failures in the last 100 valid tests greater than or equal to 5, the test frequency shall be at least once per 7 days.

Contrary to the above, on June 26, 1992, the licensee determined that, on two occasions, Emergency Diesel Generator (EDG) B was not tested within the required 7-day interval. These tests were

required to be performed because, on June 8, 1992, EDG B experienced its fifth valid test failure in the last 100 valid tests. As a result, EDG B should have been tested by June 15 and 23, 1992. EDG B was not tested until June 26, 1992.

2. TS 4.6.1.3.b requires that each containment air lock shall be demonstrated OPERABLE by conducting an overall air lock leakage test at not less than 48 pounds per square inch and by verifying the overall air lock leakage rate is within its limit at least once per 6 months. This is accomplished by Procedure STS PE-014A, "Containment Air Locks Test (Personnel Hatch)," and Procedure STS PE-014B, "Containment Air Locks Test (Equipment Hatch)."

Contrary to the above, on July 7, 1992, the licensee determined that the personnel and emergency air lock tests were not performed within the required 6-month interval. Procedure STS PE-14A became late on May 26, 1992, and was performed on June 25, 1992, 31 days overdue. Procedure STS PE-14B became late on March 21, 1992, and was performed on April 15, 1992, 26 days overdue.

This is a Severity Level IV violation. (Supplement I) (482/9212-02)

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, the Commission may issue an Order or Demand for Information as to 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 *10th* day of *August* 1992