

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 April 19 to May 30, 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 Follow 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, February 1978. RG 1.33, Appendix A, Item 9.a, requires that maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances. This is accomplished, in part, by Procedure ADM 01-057, Revision 24, "Work Request."

Step 2.1 of Procedure ADM 01-057 requires that the work request will be used to document and control work on plant systems.

Contrary to the above, on May 21, 1992, licensee personnel performed maintenance on the reach-rod attachment for Valve BG V322 (boric acid filter drain valve) without a work request. The work was performed to remove interferences and allowed the valve to be positioned fully closed.

This is a Severity Level IV violation. (Supplement I) (482/9208-02)

B. Failure to Have Appropriate 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. 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. One example of violating this requirement is stated below:

RG 1.33, Appendix A, Item 7.c.(1), requires procedures for the collection, storage, and discharge of gaseous waste. This is accomplished, in part, by Procedure SYS HA-200, Revision 10, "Waste Gas System Startup and Shutdown."

Contrary to the above, on April 23, 1992, SYS HA-200 was determined to have been inappropriate to the circumstances because it did not provide

adequate guidance for placing the waste gas decay tank in service. As a result, an inadvertent radioactive release of gaseous waste occurred in the radwaste building.

This is a Severity Level IV violation. (Supplement I) (482/9208-01)

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 future 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 *30th* day of *June*, 1992