

APPENDIX A

NOTICE OF VIOLATION

Kansas Gas and Electric Company
Wolf Creek Generating Station

Docket: 50-482/85-38
License: NPF-42

During an NRC inspection conducted during December 1985, a violation of NRC requirements was identified. The violation involved the failure to protect safety-related equipment from potential hazards. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

Failure to Establish Procedures For Certain Activities That Could Affect the Performance of Safety-Related Equipment

Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering . . . a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Section 9.a, Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 states that, "Maintenance that can affect the performance of safety-related equipment should be properly preplanned in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances."

Contrary to the above, the NRC inspectors observed the following maintenance-related conditions that could have affected the performance of safety-related equipment, but no procedures had been established to cover the situation.

- On December 23, 1985, a stepladder (approximately 6' long) was observed that had been abandoned above the control room suspended ceiling. The ladder could have fallen on operators and/or safety-related components.
- On December 12, 1985, an unattended stepladder (approximately 6' long) was observed on a catwalk approximately 30' above emergency diesel generator 'B'. The ladder could have fallen and damaged components of the emergency diesel generator system.
- On December 12, 1985, an extension ladder (approximately 12' long) was observed being supported by safety-related conduit 3J1025. The conduit is located on the 2000' level in the northeast corner of the auxiliary building. On December 18, 1985, an extension ladder (approximately 12' long) was observed being supported by residual heat removal (RHR) system piping in the RHR heat exchanger room 'A' on the 2000' level of the auxiliary building.

B602030232 860129
PDR ADOCK 05000482
G PDR

Improperly secured ladders above seismically qualified components presents unanalyzed conditions if a postulated Safe Shutdown Earthquake (SSE) should occur.

- Numerous equipment hoists mounted on monorails over the top of safety-related equipment were observed with the lifting hooks hanging in a lowered position where they could possibly strike and damage safety-related equipment (i.e., valves, pumps). On December 12, 1985, the NRC inspectors observed hoist lifting hooks hanging in the lowered position adjacent to the following safety-related equipment:
 - Main Steam Isolation Valves AB HV-11, AB HV-14 and AB HV-17
 - Coolant Charging Pump 'A'
 - Safety Injection Pump 'A'

This is a Severity Level IV violation (Supplement I.D) (50-482/8538-01).

Pursuant to the provisions of 10 CFR 2.201, Kansas Gas and Electric Company is hereby required to submit to this Office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved; (3) the corrective steps which will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas
this 29th day of Jan, 1986.