

ENCLOSURE 1

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 on February 23 through April 5, 1997, four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 6.8.1 requires, in part, that procedures be established, implemented, and maintained covering the activities referenced in Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Section 7(a), requires procedures for the liquid radioactive waste system.

Systems Procedure SYS HB-135, "Liquid Radwaste Demin Floor Drain and Waste Holdup Tanks Processing," Revision 0, Precaution Step 4.12, states, "Do not exceed Waste Monitor Tank A or B (THB07A or THB07B) level of 90 percent to prevent an inadvertent overflow."

Alarm Response Procedure ALR 702, "Liquid Process Control Panel HB-115," Revision 2, Attachment S, "702-08A, Waste Monitor Tank 1 HI-LO Level," requires that liquid transfers to Waste Monitor Tank 1 (WMT B) be stopped if the level is greater than 90 percent.

Contrary to the above, on February 27, 1996, radwaste operators did not follow the above procedural guidance and disregarded the panel alarm when they were instructed by their supervisor to exceed the precautionary 90 percent fill limit and fill the waste monitor tank to the 95-97 percent level.

This is a Severity Level IV violation (Supplement IV) (482/9708-01) (EA 97-108).

- B. With one required diesel generator inoperable, Technical Specification 3.8.1.1, Action b, requires the performance of surveillance testing to demonstrate the operability of offsite alternating current sources by performing Technical Specification Surveillance 4.8.1.1 within 1 hour.

Contrary to the above, on May 16, 1996, maintenance personnel inadvertently rendered Emergency Diesel Generator A inoperable by lifting leads that rendered Essential Service Water Pump A inoperable, and the licensee failed to perform Technical Specification Surveillance 4.8.1.1.1 within 1 hour.

This is a Severity Level IV violation (Supplement I) (482/9708-03).

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- C. Criterion V of Appendix B to 10 CFR Part 50 requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Administrative Procedure AP 22C-003, "Operational Risk Assessment Program," Revision 1, requires the performance of operational risk assessments for equipment removed from service for maintenance activities.

Step 6.1.3 of Procedure AP 22C-003, requires any activities added to or slipped from the current weekly Revision 0 schedule be assessed and documented on the original operational risk assessment.

Contrary to the above, on April 2 and 3, 1997, the licensee added activities which had been slipped from the weekly Revision 0 schedule without documenting an assessment of risk on the operational risk assessment.

This is a Severity Level IV violation (Supplement I) (482/9708-02).

- D. 10 CFR 50.71(e) requires that each person licensed to operate a nuclear power reactor update periodically the Final Safety Analysis Report to assure that the information included in the Final Safety Analysis Report contains the latest material developed. The Updated Safety Analysis Report is to include the effects of all changes made in the facility.

Contrary to the above, as of September 23, 1996, the licensee had not updated the Updated Safety Analysis Report Figure 9.3-8-03, "Piping and Instrumentation Diagram Chemical and Volume Control System," to reflect actual plant practices regarding Valve BG 8483A or Updated Safety Analysis Report Figure 6.2.4-1, "Containment Penetrations," to reflect the following changes:

- On Sheet 17, Valve EJ V167 was identified as a containment isolation valve, but was never installed in the plant. Valve EJ V124 was not shown in the same location as actually installed. Valves EJ V177 and -V178 are shown reversed from their actual orientation in the plant.
- On Sheet 23, Valve EJ V166 was not shown, but is installed in the plant.
- On Sheet 36, Valves EJ V164, -V166, and -V168 were not shown in the proper orientation.
- On Sheet 38, Valve EJ V116 was not shown in the correct location.
- On Sheet 42b, Valve SJ V114 was not identified on the diagram as a containment isolation valve.

- On Sheet 43, Valve EM HV200 was identified, but was never installed in the plant.
- On Sheet 53, Valves EG V397 and -V126 were shown in the wrong location.
- On Sheet 54, Valves EG V371, -V377, and -V369 were shown in the wrong location.
- On Sheet 56, Valve EJ V152 was identified, but was never installed in the plant.
- On Sheet 58, Valves EJ V171 and -V172 are shown reversed from the actual installation in the plant.
- On Sheet 64, Valve BB V1 is identified as BB V-051.
- On Sheet 66, Valve EM V0038 is shown open, but it is maintained locked closed in the plant.

This is a Severity Level IV violation (Supplement I) (482/9708-05).

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, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to 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.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it

necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas
this 25th day of April 1997