

APPENDIX A

NOTICE OF VIOLATION

Wolf Creek Nuclear Operating Corporation
Wolf Creek Generating Station

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

During an NRC inspection conducted on July 11-15, 1988, violations of NRC requirements were identified. The violations involved failure to remove an individual from watchstanding activities, failure to properly establish a fire watch, and failure to implement adequate corrective action. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

A. Failure to Implement Procedures

Wolf Creek Generating Station 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."

Appendix A to Regulatory Guide 1.33 specifies, in part, that safety-related activities conducted during the operations phase should be covered by written procedures.

The following are examples of failure to implement the appropriate procedures:

1. Failure to Remove an Individual From Watchstanding Activities

Procedure ADM 06-224, Revision 5, "Licensed Operator Requalification Training Program," had been established to ensure a proficient operating staff.

Procedure ADM 06-224, Step 6.5.2.5.2, requires that, "An individual enrolled in an accelerated requalification program shall be removed from all licensed duties until he has successfully completed the Accelerated Requalification Program."

Contrary to the above, after having been notified of failing the annual requalification examination on August 11, 1987, a licensed operator stood six watches during the time period of August 11-16, 1987.

2. Failure to Properly Establish a Firewatch

Procedure ADM 13-103, Revision 3, "Fire Protection: Impairment Control," had been established and implemented in accordance with the above requirements.

Procedure ADM 13-103, Step 4.1, requires, "A Fire Protection Impairment Control Permit form will be prepared for all Fire Protection System Impairments, both routine and emergency."

Contrary to the above, during the period April 13, 1987, through October 13, 1987, a fire impairment permit had not been issued for fire dampers undergoing post-modification testing.

This is a Severity Level IV violation. (Supplement I) (482/8821-02)

B. Failure to Implement Adequate Corrective Action

Code of Federal Regulations 10 CFR 50, Appendix B, Criterion XVI requires, in part, "Measures shall be established to assure that conditions adverse to quality, such as . . . are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Procedure QAP 16.1, Revision 1, "Corrective Action for QA Program Breakdowns," provides criteria for determining if a condition constitutes a significant condition adverse to quality, and requires, in part, that corrective action control as established in this procedure shall assure that significant conditions adverse to quality are promptly corrected to preclude recurrence.

Contrary to the above, the corrective action taken to prevent the recurrence of the inadvertent actuation of the Auxiliary Feedwater System (AFS), as reported in Licensee Event Report (LER) 482/85-019, was not sufficient to prevent the similar events reported in LER 482/85-008 and LER 482/87-018.

This is a Severity Level IV violation. (Supplement I) (482/8821-04)

Pursuant to the provisions of 10 CFR 2.201, Wolf Creek Nuclear Operating Corporation 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 violation 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 2nd day of September 1988.