



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

September 29, 1998

EA 98-274

Otto L. Maynard, President and
Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, Kansas 66839

SUBJECT: NRC INSPECTION REPORT 50-482/98-12 AND NOTICE OF VIOLATION

Dear Mr. Maynard:

From March 23 through June 26, 1998, an engineering and technical support inspection and an engineering open item inspection were conducted at your Wolf Creek Generating Station reactor facility. The enclosed report presents the scope and results of those inspections. The results of those inspections were discussed with Messers. R. Holloway, B. Smith, T. Harris, and R. Muench of your staff on September 29, 1998.

The engineering and technical support inspection performed an assessment of the high head injection system, control room ventilation, and the Class 1E dc distribution system. The open items inspection was performed to review open items from other engineering inspection efforts. On the basis of the results of our review, your engineering program was adequate to support safe operation of the plant, and most of your engineering processes are functioning well.

However, some findings revealed weaknesses in your program. The most significant finding concerned a failure to adequately evaluate the timing of emergency actions associated with recovery from a loss-of-coolant accident prior to the switchover of suction from the refueling water storage tank to the containment recirculation sumps. The inspection revealed that the timeline presented in the Updated Safety Analysis Report was not consistent with that actually achievable in the plant. We were satisfied that contingencies in design and operation would have prevented a serious safety problem. However, in review of the regulatory implications, a violation of 10 CFR 50.59 was identified for making changes to the facility, which involved an unreviewed safety question without prior Commission approval and without performing safety evaluations.

There were examples of a failure to follow procedures and a failure to have adequate procedures. The first example involved a failure to follow design change procedures by not incorporating design changes for the station batteries into the applicable calculation. The second example involved the failure to have adequate acceptance criteria in surveillance procedures used to test the station batteries. The first item was of concern in that engineers failed to follow the procedure for design control packages. This failure appeared to be the result of the use of engineering judgement in lieu of formal analysis. The second item was of concern because the inadequate acceptance criteria could have resulted in station batteries that were unable to cope with design accident events.

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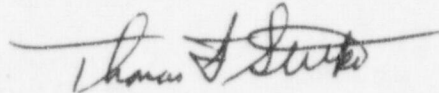
There were five examples of a failure to adequately implement your design change program. These examples involved failures to assure that design calculations were revised when applicable design changes were made, that design calculation results were consistent with the Updated Safety Analysis Report, that all variables were addressed in the instrument uncertainty calculations, and the use of incorrect parameters in the design basis calculations.

These violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding the violations are described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements. As documented in the Notice of Violation, the NRC has concluded that your responses to violation Examples B.2 and C.1 through C.5 were complete and that no further response is required.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room (PDR).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Thomas F. Stetka, Acting Chief
Engineering Branch
Division of Reactor Safety

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

Enclosures:

1. Notice of Violation
2. NRC Inspection Report
50-482/98-12

cc w/enclosures:
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E-Mail report to T. Frye (TJF)
 E-Mail report to D. Lange (DJL)
 E-Mail report to NRR Event Tracking System (IPAS)
 E-Mail report to Document Control Desk (DOCDESK)

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator
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 DRS Deputy Director
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 DRP Director
 SRI (Callaway, RIV)
 Branch Chief (DRP/B)
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 J. Lieberman, OE, MS:7-H5
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DOCUMENT NAME: R:_WC\WC812rp.wpd

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*Previously concurred

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Regional Administrator
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 DRS Deputy Director
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 SRI (Callaway, RIV)
 Branch Chief (DRP/B)
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