

APPENDIX A  
NOTICE OF VIOLATION

Wolf Creek Nuclear Operating Corporation  
Wolf Creek Generating Station (WCGS)

Docket: 50-482  
Operating License: NPF-42

During an NRC inspection conducted February 15 through March 31, 1988, a violation of NRC requirements was identified. The violation involved a failure to follow procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

Failure to Follow Procedures

Technical Specification (TS) 6.8.1 requires that written procedures shall be established, implemented, and maintained including the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33 includes procedures for the control of maintenance and modification work.

Procedure ADM 01-042, Revision 10, "Plant Modification Request Implementation," provides the requirements for planning, processing, and implementing plant modification requests (PMR) and requires that a work request be used to implement any field work required by a PMR.

Procedure ADM-01-057, Revision 12, "Work Request," establishes the use of work requests, requires that the work be performed as specified, and only allows block 26 of the work request to be checked "NO" if the maintenance activity does not affect plant operation.

Contrary to the above, on March 13 and 20, 1988, it was found that administrative procedure requirements for the use of work requests were not being implemented. The following examples were noted:

1. Work Request 70294-87 was issued to implement PMR 02173 for "Scaffolding Storage Areas in RCA." This PMR required that large scaffolding components be stacked in an orderly fashion on platform trucks or preassembled scaffold sections and that small components such as base plates and clamps be stored in metal containers with lids.

On March 20, 1988, the NRC inspector found, at the 1974 level north end that large scaffold pieces were not on platforms or scaffold sections and small components were not stored in metal containers as specified.

2. Work Request 50070-88 was issued for semi-annual maintenance on the auxiliary feedwater pump motor which required removing the pump from service.

On March 13, 1988, during review of this work request, the NRC inspector found block 26 check "NO", along with no Technical Specification (TS) reference or time limit specified. This was incorrect in that plant operation was affected by entering a 72-hour limiting condition of operation per TS 3.7.1.2.

3. Work Request 50070-88 also required that the oil from each motor bearing be sampled and that the general condition of the old oil be recorded on the work request.

On March 13, 1988, the NRC inspector found that the general condition of the old oil was not recorded on the work request as specified.

This is a Severity Level IV violation. (Supplement I)(482/8807-38)

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 12th day of May 1988.