

APPENDIX A
NOTICE OF VIOLATION

Wolf Creek Nuclear Operating Corporation
Wolf Creek Generating Station

Docket: STN 50-482
Operating License: NPF-42

During an NRC inspection conducted on May 2-6, 1988, violations of NRC requirements were identified. The violations involved failure to have procedures appropriate to the circumstances, failure to maintain adequate and complete records, and failure to take adequate and timely corrective actions. 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 Have Procedures Appropriate to the Circumstances

Technical Specification 6.8.1 requires that written procedures shall be established including the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978. Regulatory Guide 1.33 addresses procedures that include surveillance requirements. Appendix B, Criterion V of 10 CFR 50 requires that procedures be appropriate to the circumstances.

Contrary to the above, between May 2, 1985, and April 15, 1988, the licensee performed daily surveillances on the loose parts monitoring system, utilizing a surveillance procedure inappropriate to the circumstances.

This is a Severity Level IV violation. (Supplement I) (482/8817-01)

B. Failure to Maintain Adequate and Complete Records

The Code of Federal Regulations, 10 CFR 50, Appendix B, Criterion XI, "Test Control," requires, in part, that a test program shall be established to assure and demonstrate that structures, systems, and components will perform satisfactorily in service in accordance with written test procedures which incorporate design requirements. Furthermore, test results shall be documented and evaluated to assure that test requirements have been satisfied.

Contrary to the above, Plant Modification Requests (PMRs) 0823 and 0950 work packages completed in May 1985 did not contain evidence that post-modification testing had been accomplished or evaluated.

This is a Severity Level IV violation. (Supplement I) (482/8817-02)

C. Failure to Take Adequate and Timely Corrective Actions

Code of Federal Regulations, Title 10, Part 50, Appendix B, Criterion XVI, states, in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies,

deviations, defective materials and equipment, and nonconformances are promptly identified and corrected." Also, the licensee's Updated Safety Analysis Report, Revision 0, paragraph 17.2.16.1, states, in part, "Corrective action control measures have been established to assure that conditions adverse to quality are promptly identified, reported, and corrected to preclude recurrence"

Contrary to the above, Wolf Creek Event Report 86-49 was issued on June 24, 1986, to initiate corrective action for the high failure rate of surveillance tests on the containment hydrogen analyzers. Corrective action for this problem had neither been determined nor implemented by the licensee on May 5, 1988.

This is a Severity Level IV violation. (Supplement I) (482/8817-03)

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 10th day of June 1988.