

APPENDIX A

NOTICE OF VIOLATION

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

Docket: 50-482/89-09
Operating License: NPF-42

During an NRC inspection conducted March 13-17, 1989, three violations of NRC requirements were identified. The violations involved: (1) failure to perform exit whole body counts, (2) overexposure to the skin of the whole body, and (3) failure to complete Technical Specification (TS) surveillance test. 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 Perform Exit Whole Body Counts

TS 6.11 requires that, "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposures."

Administrative Procedure ADM-03-100, "Health Physics Dosimetry Program," Revision 6, dated October 27, 1987, paragraph 4.1.3.1 requires that, individuals who have been issued a thermoluminescent dosimeter will receive a termination whole body count. If an individual terminates without obtaining an exit whole body count, an attempt will be made to contact the individual to request they return to WCGS or another mutually acceptable facility for a whole body count. A record indicating the attempted contact will be placed in the individuals exposure history file.

Contrary to the above, the NRC inspector determined on March 14, 1989, that during the period July 1, 1988, through March 14, 1989, seven individuals had left the WCGS without receiving an exit whole body count and no record was included in their individual exposure history file indicating that an attempt had been made to contact the individual to request they return to WCGS or another mutually acceptable facility for a whole body count.

This is a Severity Level V violation. (482/8909-01)

B. Overexposure to the Skin of the Whole Body

10 CFR Part 20.101(a) requires, in part, that ". . . no licensee shall possess, use, or transfer licensed material in such a manner as to cause any individual in a restricted area to receive in any period of one calendar quarter from radioactive material and other sources of radiation a total occupational dose in excess of . . . (7.5 rems per calendar quarter to the skin of the whole body)."

Contrary to the above, the NRC inspector determined during a review of Licensee Event Report 88-028, dated January 6, 1989, and subsequent onsite inspection on March 15, 1989, that an individual had received a radiation exposure to the skin of the whole body of 12.5 rems on December 9, 1988, from a hot particle located on the individual's chin.

This is a Severity Level IV violation. (482/8909-02)

C. Failure to Complete Technical Specification Surveillance Test

TS 3/4.3.3.10, Table 4.3-8 and TS 3/4.3.3.11, Table 4.3-9 require that process effluent radioactivity monitors, which provide an alarm and automatic termination of effluent releases, be source checked prior to each release. The licensee's system operating procedures for performing radioactive effluent discharges require that this source check surveillance test be performed and documented in accordance with STS SP-001, "Process Radiation Monitoring System Source Check and Valve Stroke," prior to each effluent batch release.

Contrary to the above, the NRC inspector determined on March 15, 1989, that only 25 out of 203 liquid effluent batch releases, one containment purge release out of 51 containment releases, and none of the seven gas decay tank releases conducted in 1988 had completed STS SP-001 surveillance test results in the WCGS records vault documenting the performance of the process radiation monitoring system source check and valve stroke surveillance test prior to each radioactive effluent batch release.

This is a Severity Level IV violation. (482/8909-03)

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 21st day of April 1989