

NOTICE OF VIOLATION  
AND  
PROPOSED IMPOSITION OF CIVIL PENALTY

Kansas Gas and Electric Company  
Wolf Creek Generating Station

Docket No.: 50-482  
License No.: CPPR-147  
EA 85-27

During October and November 1984 and February 1-28, 1985 members of the NRC staff conducted a routine inspection of preoperational testing activities at the Wolf Creek Generating Station (WCGS). As a result of this inspection, violations of NRC requirements were identified.

To emphasize the importance that NRC places on the execution of the licensee's preoperational test program to ensure that the program demonstrates the functional capabilities of structures, systems, and components, the NRC proposes to impose a civil penalty in the amount of Twenty-Five Thousand Dollars (\$25,000). In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended ("Act"), 42 U.S.C. 2282, PL 96-295, and 10 CFR 2.205, the particular violations are set forth below:

I. Violations Assessed a Civil Penalty

10 CFR Part 50, Appendix B, Criterion XI requires that a test program be established to assure that testing required to demonstrate that the structures, systems, and components perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The test program is to include, as appropriate, proof test prior to installation, preoperational tests, and operational tests during nuclear power plant or fuel reprocessing plant operation, of structures, systems, and components. Test procedures are to include provisions for assuring that all prerequisites for the given test have been met, that adequate test instrumentation is available and used, and that the test is performed under suitable environmental conditions. Test results are to be documented and evaluated to assure that test requirements have been satisfied.

Section 17.2. of the Wolf Creek Addendum to the SNUPPS FSAR, "Quality Assurance During the Operation Phase," requires that testing be performed to demonstrate that structures, systems, and components perform satisfactorily in service. The test program includes preoperational tests, initial startup tests, surveillance tests, pump and valve tests, and special tests, including those associated with plant maintenance, modification, procedure changes, failure analysis, and the acceptance of purchased material.

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Test programs are to be established by the Director, Nuclear Operations to assure that testing demonstrates item or system performance. Testing is to be performed in accordance with written procedures which incorporate or reference the requirements and acceptance limits contained in applicable Technical Specifications, drawings, instructions, procurement documents, specifications, codes, standards, and regulatory requirements. Test program procedures control when a test is required and how it is to be performed.

Test administrative procedures, test procedures, and checklists employed during tests are to include, as applicable, prerequisite conditions; material and test equipment requirements; mandatory hold points; testing method instructions; limiting conditions and acceptance/rejection criteria; data collection method; and test result approval requirements. Test results are to be documented, reviewed, and approved by qualified individuals or groups.

Contrary to the above, at the time of the NRC inspection, the Kansas Gas and Electric Company had not established and executed an adequate preoperational test program which would have demonstrated that structures, systems, and components would perform satisfactorily in service. The following are examples of failures to adequately establish or implement the above program:

- A. Verification of design safety features was not performed as Preoperational Test Procedures SU3-AE01, "Main Feedwater System," SU3-AB04, "Main Steam System," and SU3-NF01, "Load Shedding and Load Sequencer," did not include provisions to verify that safety system actuation signals would override test signals for certain components, as required by design and as specified in Sections 14.2.12.1.5, 14.2.12.1.3, and 14.2.12.1.63 of the Wolf Creek FSAR.
- B. Test Procedures SU3-NF01, "LOCA Sequencer," and SU3-NF03, "Shutdown Sequencer," failed to demonstrate component performance under limiting accident conditions.
- C. Neither the use of proper testing equipment nor the use of proper testing methods was ensured in that: (1) a pressure gauge of improper range was used to measure the performance of Residual Heat Removal System pumps in test SU3-EJ01, "Residual Heat Removal System", (2) a procedure SU3-NE01, "Diesel Generator Electrical," did not specify adequate conditions for test performance in accordance with FSAR Section B.1.4.3, and (3) the test program did not specify adequate testing of the failure mode of air operated valves.
- D. Preoperational Test Procedure SU3-NK01, "125 VDC Class 1E Electrical System," did not incorporate a commitment from FSAR Section 8.3.2.2.1 to measure safety-related battery room hydrogen concentration during battery operation.

This is a Severity Level III Violation (Supplement II).  
Civil Penalty - \$25,000

## II. Violations Not Assessed a Civil Penalty

- A. 10 CFR Part 50, Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with instructions, procedures, or drawings. Kansas Gas and Electric (KG&E) Administrative Procedure ADM 07-100, Revision 23, also requires in Section 3.1 that the plant be operated and maintained in accordance with approved procedures.

Contrary to the above, the following failures to perform activities in accordance with procedures occurred:

1. The shift supervisor failed to obtain evaluation of impairments to fire protection systems by the fire protection specialist prior to issuing Impairment Control Permits 85-47 and 85-87 as required by KG&E Administrative Procedure 13-103, Revision 1, Section 2.2.
2. On February 12, 1985, the shift supervisor approved Maintenance Work Request 02783-85 for work on Main Steam Isolation Valve ABHV-20 without the applicable Technical Specification reference (4.6.3.3) entered in block 10 as required by Administrative Procedure ADM 01-057, Rev. 4, page 17. Furthermore, he failed to initiate an equipment out-of-service log entry as required by ADM 02-105, Rev. 0.
3. On February 26, 1985, the NRC inspector observed Fire Door 13221 to the south mechanical penetration room on the 2000' level of the auxiliary building propped open. Also, the NRC inspector observed Fire Door 31041 from the auxiliary building to the health physics access area open with the latching mechanism disassembled. In both situations, no impairment control permit had been obtained and posted as required by ADM 13-103.

This is a Severity Level V violation (Supplement II).

Due to the response already received and discussed in Inspection Report 50-482/85-11, no written response to this item is required. This violation is closed.

- B. 10 CFR Part 50, Appendix B, Criterion XI requires that a test program be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Section 17.2.11 of the Wolf Creek Addendum to the SNUPPS FSAR requires that testing be performed in accordance with written procedures.

Contrary to the above, Preoperational Test Procedure SU3-EM02, "Safety Injection Flow Verification," was inadequate in that Data Sheet 8.16, "Safety Injection Hot Leg Flow Balance," specified an incorrect formula when converting test data into flow rate.

This is a Severity Level V Violation (Supplement II).

Due to your response already received and included in Inspection Report 50-482/85-11, no written response to this item is required. This violation is closed.

- C. 10 CFR Part 50, Appendix B, Criterion XI requires that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptable limits contained in applicable design documents.

KG&E Administrative Procedure ADM 02-101, Revision 11, "Temporary Modifications," in paragraph 3.1.6 requires that if the procedure authorizing the installation of a modification is suspended for a period of greater than 24 hours, the modification must be restored to normal or tagged in accordance with this procedure.

Contrary to the above, at the time of this inspection, test flanges rather than the required blind flanges to Flow Elements EM-924, EM-925, EM-926, and EM-927 were installed downstream of certain safety injection valves and the test flanges were not tagged as a temporary modification in accordance with ADM 02-101.

This is a Severity Level V Violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Kansas Gas and Electric Company is hereby required to submit to the Director, Office of Inspection and Enforcement, US Nuclear Commission, Washington, D.C. 20555, with a copy to the Regional Administrator, US Nuclear Regulatory Commission, Region IV, within 30 days of the date of this Notice, a written statement or explanation in reply, including for each alleged violation: (1) admission or denial of the alleged violation; (2) the reasons for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) the corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this notice, the Director, Office of Inspection and Enforcement, may issue an order to show cause why the license should not be modified, suspended or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, U.S.C. 2232, this response shall be submitted under oath or affirmation.



Notice of Violation

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Within the same time as provided for the response required above under 10 CFR 2.201, the Kansas Gas and Electric Company may pay the civil penalty in the amount of Twenty-Five Thousand Dollars (\$25,000) or may protest imposition of the civil penalty in whole or in part by a written answer. Should the Kansas Gas and Electric Company fail to answer within the time specified, the Director, Office of Inspection and Enforcement, will issue an order imposing the civil penalty in the amount proposed above. Should the Kansas Gas and Electric Company elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, such answer may: (1) deny the violation listed in this Notice in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice, or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request mitigation of the penalty.

In requesting mitigation of the proposed penalty, the five factors contained in Section V.B of 10 CFR Part 2, Appendix C (1985) should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The Kansas Gas and Electric Company's attention is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalty due, which has been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION

  
for Robert D. Martin  
Regional Administrator

Dated at Arlington, Texas  
this 8 day of May 1985