

APPENDIX A

NOTICE OF VIOLATION

Kansas Gas and Electric Company  
Wolf Creek Generating Station

Docket: 50-482/85-26  
License: NPF-42

During an NRC inspection conducted on June 21 and 26 two violations of NRC requirements were identified. The violations involved failure to control measuring and test equipment in accordance with procedure and failure to incorporate temporary changes in procedure as required. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Failure to Control Measuring and Test Equipment in Accordance With Procedure

10 CFR Part 50, Appendix B, Criterion V states, in part, "Activities affecting quality...shall be accomplished in accordance with these instructions, procedures, or drawings...."

The following are excerpts from plant procedures that have been established in accordance with 10 CFR Part 50, Appendix B, Criterion V:

- . Administrative Procedure, ADM 02-101, "Temporary Modifications," Revision 12, dated May 16, 1985, in Section 5.4 states, in part:  
"The placement of temporary modifications authorized by approved procedures are excluded from the requirements of this procedure.... If the procedure authorizing the installation of a modification is to be suspended or terminated, the modification must be restored to normal, or the operations shift responsible for the suspension/termination must initiate the temporary modification order form...."
- . In Section 2.2, ADM 02-101, states, in part, "The duty shift supervisor shall approve all temporary modifications.... A 10 CFR 50.59 applicability review will be conducted for all temporary modifications."

Contrary to the above, on June 26, 1985, Pressure Gauge WC9967 was observed connected to flow orifice flange BN-FI-968, located in safety injection pump room 'B' without the use of a temporary modification order, approved procedure, or a 10 CFR 50.59 applicability review.

This is a Severity Level IV violation (Supplement I.D)  
(50-482/8526-01).

B. Temporary Changes not Incorporated in Procedure as Required

10 CFR Part 50, Appendix B, Criterion V states, in part, "Activities affecting quality... shall be accomplished in accordance with these instructions, procedures, or drawings...."

Administrative Procedure ADM 02-021, Revision 6, "Use of Procedures in Operations," has been established in accordance with 10 CFR Part 50, Appendix B, Criterion V.

Step 3.1.1 of Procedure ADM 02-021 requires that, prior to use, a procedure will be verified to ensure that it is the current revision.

Contrary to the above, on June 21, 1985, Surveillance Procedure STS SE-001, Revision 2, "Power Range Adjustment to Calorimetric," was performed without having applicable temporary changes incorporated.

This is a Severity Level V violation (Supplement I.E)  
(50-482/8526-02).

Pursuant to the provisions of 10 CFR 2.201, Kansas Gas and Electric Company 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 violations 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 shown, consideration may be given to extending your response time.

Dated at Arlington, Texas,  
this 20th day of September, 1985.