

ENCLOSURE 1

NOTICE OF VIOLATION

Wolf Creek Nuclear Operating Corporation
Wolf Creek Generating Station

Docket No.: 50-482
License No.: NPF-42

During an NRC inspection conducted on October 20 through November 30, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Criterion V of Appendix B to 10 CFR Part 50 requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings.

Procedure ADM 02-024, "Technical Specification Operability," requires operability determinations to include a determination of the requirement or commitment established for the equipment.

Contrary to the above, on November 11, 1996, the system engineer provided an operability recommendation to the shift supervisor for the turbine-driven auxiliary feedwater pump based on an evaluation of an oil leak from the turbine governor system without properly identifying the leaking governor equipment and properly evaluating the effect of the leak on this governor equipment.

This is a Severity Level IV violation (Supplement I) (482/9623-01).

- B. Technical Specification 6.8.1.h requires, in part, that procedures shall be established, implemented, and maintained covering fire protection program implementation.

Procedure AP 10-100, "Fire Protection," Revision 1, requires Procedure STN FP-204, "Fire Protection System Flow and Sequential Pump Start," Revision 10, to perform a flow test in accordance with Chapter 5, Section 11 of the National Fire Protection Association (NFPA) Fire Protection Handbook, 14th Edition.

Contrary to the above, on October 24, 1996, fire protection personnel failed to properly establish and maintain Procedure STN FP-204 as evidenced by the following examples:

- 1) The NFPA Fire Protection Handbook provided instructions to take pitot tube readings in the center of the flow stream at a distance equal to one half of the diameter of the nozzle opening. Procedure STN FP-204 contained no such instructions, which resulted in different personnel using different methods to take readings during the test.

- 2) The NFPA Fire Protection Handbook also provided a caution that pitot tube readings less than 10 psi or greater than 30 psi at any open hydrant should be avoided. Procedure STN FP-204 contained no such limits and readings taken on October 24 exceeded 30 psi. While the readings were taken on a test header and not an open hydrant, the handbook provided limits because of reduced accuracy at higher pressures.
- 3) Procedure AP 10-100 required Procedure STN FP-204 to perform a flow test in accordance with the NFPA Fire Protection Handbook, 14th edition. However, the scope statement for Procedure STN FP-204 stated that the test was in accordance with NFPA Standard 20 and American Nuclear Insurers requirements.

This is a Severity Level IV violation (Supplement I) (482/9623-03).

Pursuant to the provisions of 10 CFR 2.201, Wolf Creek Nuclear Operating Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas
this 13th day of December 1996