



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT-OPERATIONS

June 18, 1979

Mr. W.C. Seidle, Chief
Reactor Construction and
Engineering Support Branch
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Subject: Response to Inspection Report 50-482/79-08

Dear Mr. Seidle:

This letter is written in response to your letter of May 17, 1979, which transmitted Inspection Report 50-482/79-08. As requested each finding is being addressed in three parts:

- a) Corrective steps which have been taken and the results achieved,
- b) Corrective steps which will be taken to avoid further non-compliance, and
- c) The dates when full compliance will be achieved.

Finding

At 8:30 a.m. on April 18, 1979, the NRC Inspector observed that the construction joints at the north and east face of Placement OC-141-S-01 (floor slab in south portion of Fuel Handling Building) were dry and were not being cured as specified by ACI 308. Discussion with contractor personnel verified that sealing materials had not been applied.

Response

- a) The forms for placement OC-141-S-01 were removed during the night before the dry surfaces were observed by the NRC Inspector. The Constructors QC Inspector had not yet made his post placement inspection. When advised of the NRC

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observations, construction forces took prompt action and began proper curing within two hours.

Area Supervision has been directed to perform additional training of personnel responsible for curing to assure that the requirements of the applicable specifications and Daniel Work Procedures are strictly followed.

- b) Informal training of construction personnel in the requirements for curing concrete has been conducted. Formal training will be conducted and documented by June 22, 1979.

Increased surveillance of concrete curing by Daniel's QA organization will be conducted. If curing errors reoccur, additional corrective measures will be taken.

- c) Full compliance will be achieved by July 1, 1979.

Finding

Daniel Procedure AP-I-02, Rev. 6, dated November 2, 1978, paragraph 3.7 states, "Each procedure shall be complete with project name, title, type, number, volume, section, date, revision number, and approval signatures. When revisions are issued, the date shall be displayed along with the revision number and the revision approval signature."

Contrary to the above:

1. Paragraph 3.7 of Daniel Procedure AP-I-02 only applies to Daniel originated procedures and not to procedures written by subcontractors such as Clarkson Construction Company. Discussion with the Daniel Field QA Manager verified that Daniel had no measures requiring the approval of Clarkson procedures.
2. The Clarkson Construction Company Blasting Procedure Specification A-3854, dated April 27, 1978, was not reviewed and approved for implementation prior to commencement of blasting on the Ultimate Heat Sink.
3. The blasting procedure was not assigned a revision number or some other means to establish control of the document.
4. A revised copy of the blasting procedure which incorporated a change on verbal notification of an intended blast was not signed as being approved and reviewed until April 19, 1979, after the inspector identified the item to the licensee. The

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change to verbally notify the geotechnical engineer of an intended blast was only signed off on April 19, 1979, although the change had been in effect since commencement of the Ultimate Heat Sink blasting work in December 1978.

5. The blasting procedure dated April 19, 1979, had no revision number or other means of identification to indicate it contained updated information from the procedure dated April 27, 1978.

Response

- a) An Interim Change Procedure (ICP-99) has been issued to Daniel Construction Procedure AP-IV-06 "Supervising Contractors" incorporating the procedural requirements for the review and approval cycle of subcontractor's procedures.

Clarkson Construction Company's blasting procedure has been revised and resubmitted. The blasting procedure has been through the required review cycle of ICP-99 and has been approved, sent to Document Control and distributed.

The blasting procedure has been assigned a revision number and is dated.

Clarkson's blasting procedure was initiated and reviewed by both Daniel Engineering and Dames & Moore several months prior to blasting work on the Ultimate Heat Sink. Dames & Moore had comments to be incorporated into the procedure, Clarkson had been instructed to make these changes and resubmit it. Although the procedure had not been formally signed off, it had been reviewed.

- b) AP-IV-06 will be revised to include the changes included in ICP-99 for review and approval of subcontractor's procedures. AP-IV-06 will also include the requirements for establishing control of the documents by providing revision number and title to procedures.
- c) Full compliance will be achieved on June 24, 1979.

Please advise if you need additional information.

Yours very truly,

GLK:bb

Allen L. Kautz

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