



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT-OPERATIONS

June 21, 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

Subj: Responses to Inspection Report 50-482/79-08
Notice of Deviation

Dear Mr. Seidle:

This letter is written in response to your letter of May 17, 1979 and addresses the Notice of Deviation. My letter to you of June 18, 1979 addressed the Notice of Violation. As requested, the deviation is being addressed in three parts:

- a) Corrective steps 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.

Deviation

SNUPPS PSAR Section 3.12 commits to Regulatory Guide 1.19, August 11, 1972, "Nondestructive Examination of Primary Containment Liner Welds," except for the following minor deviations, one of which is, "All nondestructive examination methods and techniques are in accordance with Section V of the ASME Boiler and Pressure Vessel Code, except for radiography which is in accordance with Appendix X of ASME Section III." (Appendix X to Section III and Article 2 of Section V are acceptable methods of meeting the requirements of Regulatory Guide 1.19, since their examination requirements are equivalent to those required by the Regulatory Guide.)

Appendix X to Section III of the ASME Boiler and Pressure Vessel Code Table X-3325.1-1, "Standard Penetrameter Sizes," requires

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that a penetrameter for weld thickness range of over 1/4" through 3/8" be of a thickness of 0.0075" and designated a No. 7 penetrameter. The liner plate is 1/4" thick.

Contrary to the above:

Bechtel Specification No. 10466-C151(Q), paragraph 7.5.1.a requires that liner seam welds be examined radiographically in accordance with the requirements of Article 3, ASME Section V, which requires in Table T-320, "Thickness Penetrameter Designations and Essential Holes," that a penetrameter for a single wall material thickness range of over 1/4" through 3/8" be a size No. 12, which has a penetrameter thickness of 0.012". This No. 12 penetrameter is 60% thicker than the No. 7 penetrameter that is specified in Appendix X to Section III of the ASME Boiler and Pressure Vessel Code.

Response

- a) Regulatory Guide 1.19, section C.2.a, references Subsection NE-5120 of the ASME Code. Changes made in 1973 to the Code made this reference incorrect. The response to Regulatory Guide 1.19 set out in PSAR Section 3.12 was intended to correct the reference to NE-5120 and was also intended to apply only to Regulatory Guide, Section C.2.a. However, a literal interpretation of the PSAR wording does not reflect these intended clarifications.

Paragraph C.1.a of Reg. Guide 1.19 pertaining to nondestructive examination of liner seam welds states, these welds should be examined radiographically in accordance with the techniques prescribed in Section V of the ASME Code.

Section V of the ASME Code, 1974 edition, contains two articles (Article 2 and Article 3) each titled, "Radiographic Examination". The subject deviation basically concerns which article applies.

Although SNUPPS is not committed to Section III, Division 2 of the 1975 edition of the ASME Code, "Concrete Reactor Vessels and Containments", it provides in paragraph CC-5531.1, "Examination of Liners - Radiographic Examination", that radiographic examination shall be performed in accordance with Article 3 of Section V which is consistent with SNUPPS specification requirements.

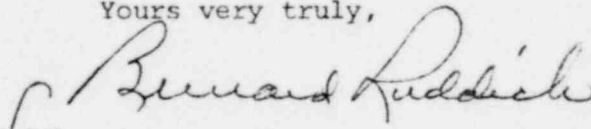
Article 3 of Section V includes requirements for radiographic examination in circumstances where the referencing section of

the Code permits greater latitude in film selection and can tolerate less sensitivity and less complete documentation than required by Article 2. Table T-320 of Article 3 is consistent with Bechtel specification No. 10466-C151(Q).

- b) In the FSAR, when addressing Reg. Guide 1.19, a clarifying statement will be made that Section V, Article 3 of the ASME Code applies to containment liner seam weld examinations and Section III, Subsection NE and Appendix X applies to containment weld examinations at penetrations, airlocks and access openings.
- c) Compliance with Reg. Guide 1.19 has been achieved. The above-described clarification of our commitment to Reg. Guide 1.19 will be included in the FSAR.

Please advise if you need additional information.

Yours very truly,


for Glenn L. Koester
Vice President - Operations

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