



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT-OPERATIONS

July 6, 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: Response to Inspection Report 50-482/79-09

Dear Mr. Seidle:

This letter is written in response to your letter of June 7, 1979, which transmitted Inspection Report 50-482/79-09. 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

Daniel Procedure QCP-I-01, Revision 5, paragraph 4.2 requires that deficiencies found during storage and maintenance inspections shall be handled by the issue of a Deficiency Report (DR) in accordance with Daniel Procedure AP-VI-02.

Contrary to the above:

Five deficiencies noted on upper and lower internals storage in QC Inspection Report No. 052 conducted February 17, 1979, were not documented in a Deficiency Report (DR).

Response

- a. To assure that all problems noted on old surveillance reports have been properly dispositioned the following steps are

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being taken:

1. Storage Surveillance Reports initiated prior to May 79 are being reviewed.
2. If a storage problem was noted on a report, a check is being made to determine if a Deficiency Report was processed; if not,
3. The equipment/material, if still in storage, is being checked to verify that the problem has been corrected.

Deficiency Reports LSD1471M and LSD1657M have been initiated for the conditions noted in the above finding.

Revision 6 to QCP-I-01 has been issued to clearly define when Deficiency Reports are to be initiated for failure to provide and maintain a proper storage environment.

- b. A training class was conducted for the responsible Quality Control Inspectors on May 3, 1979 relative to the requirements of QCP-I-01 Revision 6.
- c. Full compliance will be achieved when the review of storage surveillance reports is completed. (Estimated completion date is August 1, 1979,

#### Finding

Paragraph 6, ANSI Standard N45.2-1971 states in part, "Activities affecting quality shall be prescribed by documented instructions ... and shall be accomplished in accordance with these instructions ...." Paragraph 6 further states in part, "The activity may be prescribed in job specifications, work instructions ... test procedures, or any other type of written form, provided that the activity is adequately described. Quantitative criteria ... and qualitative criteria ... shall be specified ...."

Paragraph 17.1.5 of the SNUPPS PSAR states in part, "Each major SNUPPS contractor is responsible for controlling its activities affecting quality in accordance with documented procedures ...."

Daniel Supplier Qualification Certificates dated March 30, 1978, and April 25, 1977, require that work performed by Clarkson Construction Company on the Ultimate Heat Sink (UHS) be monitored by Daniel Quality Control personnel using existing Daniel QC procedures.

Contrary to the above:

The constructor, Daniel International, has not conducted quality control inspections or surveillance on the UHS work since its beginning on

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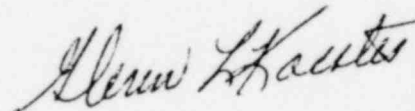
or about October 16, 1978. In addition, the applicable Daniel quality control procedures have not been identified for the UHS work nor have qualitative and quantitative acceptance criteria been specified for the blasting work.

Response

- a) 10 CFR 50, Appendix B, Criterion X states that "examinations, measurements, or tests of material or products processed shall be performed for each work operation where necessary to assure quality. To date, UHS work has been limited to blasting and excavation related activities. On June 18, 1979 the Site Geotechnical Engineer (Dames & Moore) concluded an evaluation which reaffirmed that pre-shot inspection of UHS structural excavation blasts, as well as the inspection of other UHS and UHS dam excavations, are not necessary for current UHS activities.
- b) Inspection and surveillance procedures will be implemented later in the construction phase of the UHS and UHS dam to assure compliance with applicable drawings, specifications and procedures.
- c) Construction of the UHS and UHS dam is expected to begin November, 1979. Inspection and surveillance (monitoring) of this work will be performed in accordance with approved procedures by Dames & Moore, and Daniel International at that time.

Please advise if you need additional information.

Yours very truly,



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