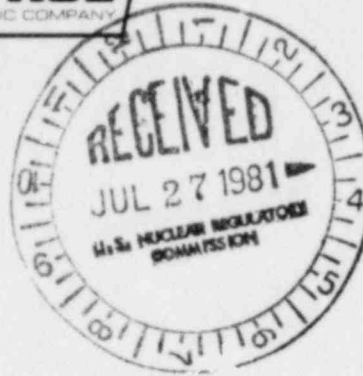




KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR



July 22, 1981

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

KMLNRC 81-100

Re: Docket Number STN 50-482

Ref: NRC Generic Letter (P1-01) - Qualification of  
Inspection, Examination, and Testing and Audit  
Personnel, dated May 4, 1981 from DGEisenhut, NRC

Dear Mr. Denton:

The referenced letter requested commitments to regulatory positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1, and Regulatory Guide 1.146, and the planned date for meeting the commitments.

Revision 3 of the Wolf Creek Generating Station (WCGS), Unit No. 1, Final Safety Analysis Report submitted in May, 1981, described Kansas Gas and Electric Company's commitment, including alternatives to the subject regulatory guides. Activities conducted subsequent to the submittal under the Operating Quality Assurance Program are required to meet this commitment.

For the construction phase, our present PSAR commitment to Regulatory Guide 1.58, Rev 0 (endorsing ANSI N45.2.6-1973) provides what we believe is an acceptable alternative to positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58 Revision 1 in that:

- a) Positions C.5 and C.10 are addressed in Sections 3.2.2 and 5.1 respectively of ANSI N45.2.6-1973;
- b) Positions C.6 and C.7 only provide additional clarification or more flexibility than is contained in ANSI N-15.2.6-1973;
- c) Position C.8 is appropriate only for operating plants or plants under construction in close proximity to an operating plant. Neither is the case for WCGS.

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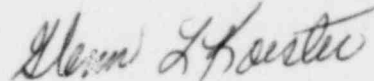
Mr. Harold R. Denton  
KMLNRC 81-100

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July 22, 1981

With regard to Regulatory Guide 1.146, Kansas Gas and Electric Company is committed to ANSI Std. N45.2.12-1974 for design and construction phase activities. This Standard includes requirements for personnel who perform audits. Because we are nearing completion of design and construction phase activities, the change to Regulatory Guide 1.146 for these activities would be more disruptive than beneficial.

Yours very truly,

A handwritten signature in cursive script, reading "Glenn L. Koester".

Glenn L. Koester  
Vice President - Nuclear

GLK:bb