



KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER  
VICE PRESIDENT, NUCLEAR

June 12, 1981

Mr. G.L. Madsen, Chief  
Reactor Projects Branch  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

KMLNRC 81-084

Re: NRC Docket No. STN 50-482/Rpt. 81-06

Dear Mr. Madsen:

This letter is written in response to your letter of May 27, 1981, which transmitted Inspection Report STN 50-482/81-06. As requested, the violation 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 items of noncompliance; and
- c) The date when full compliance will be achieved.

Finding

An unauthorized piping hanger was fabricated from nonconforming materials to replace an approved safety-related piping hanger (BN 01 COLL 123) in the Borated Refueling Water Storage System which was inadvertently destroyed.

Response

- a) The steps that have been or will be taken are:
  1. Prior to the NRC's receipt of an allegation and their subsequent investigation, an involved Craftsman had reported the problem to Daniel International Corporation (DIC) management. The subject hanger was tagged on

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June 12, 1981

April 6, 1981, and removed to the Piping Superintendent's office. The nonconforming hanger was documented on DR ISD 6526 M on April 6, 1981. The NRC duty officer received notice of allegations concerning safety-related piping hangers at Wolf Creek on April 7, 1981.

2. During DIC's investigation of the allegation, the Craftsman directed DIC Quality Control to other hangers he considered fabricated contrary to project procedures. The hangers involved were non safety-related, but were apparently fabricated from safety-related material.
  3. The welder who fabricated the hanger, and used another welder's identification symbol on the hanger, was placed on three (3) days suspension as a disciplinary action. He was reinstructed on the necessity of refusing to obey directions contrary to procedures, and on the reporting of directions of this type to DIC Management.
  4. The Foreman who directed the Craftsman to fabricate the hanger was terminated.
  5. Meetings were held with DIC piping supervision to reiterate the importance of quality, compliance with procedures, and that failure to comply with quality and procedure requirements would result in termination of employment.
  6. A reinspection of safety-related hangers installed or possibly installed by the responsible Foreman was conducted by Quality Control. Any further deficiencies found will be documented and resolved.
- b) Corrective steps which will be taken to avoid further items of noncompliance are as follows:
1. Future purchases of stock steel will be purchased as safety-related material only.
  2. Remaining non safety-related hanger material will be removed from the Wolf Creek site.
  3. Non safety-related stock steel under DIC Civil control, which could be used to fabricate hangers, will either be declared surplus and removed from the site or segregated.
  4. As a result of the recent reorganization, the scope of the Piping Superintendent has been reduced. Superintendents

Mr. G.L. Madsen  
KMLNRC 81-084

-3-

June 12, 1981

were responsible for Pipe, Hanger and Radiographic Tested Pipe installation. Under the new organization the Radiographic Tested Pipe installation has been placed under one Superintendent. Non Radiographic Tested Pipe and Hangers were placed under another Superintendent. This will provide for more effective control of hanger installation.

- c) Full compliance of the above corrective steps will be achieved by August 3, 1981.

Please feel free to contact us if you have any questions concerning this response.

Yours very truly,

*Glenn L. Kauster*

GLK:bb

cc: TVandel, Resident NRC Inspector

IN THE MATTER OF )  
KANSAS GAS AND ELECTRIC COMPANY ) Docket No. 50-482  
WOLF CREEK GENERATING STATION UNIT No. 1 )

AFFIDAVIT

I, Glenn L. Koester, of lawful age, being duly sworn, hereby depose and state that I am Vice President - Nuclear of Kansas Gas and Electric Company, that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to the Notice of Violation identified in NRC Inspection Report No. 81-06 ; that I am familiar with the contents thereof; and that the matters set forth therein are true and correct to the best of my knowledge, information and belief.

KANSAS GAS AND ELECTRIC COMPANY

By Glenn L. Koester  
Glenn L. Koester  
Vice President - Nuclear

STATE OF KANSAS )  
 ) SS:  
COUNTY OF SEDGWICK )

BE IT REMEMBERED that on this 12th day of June, 1981,  
before me, Evelyn L. Fry a Notary, personally appeared Glenn  
L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company,  
Wichita, Kansas, who is personally known to me and who executed the fore-  
going instrument, and he duly acknowledged the execution of the same for  
behalf of and as the act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal this  
date and year above written.



My Commission expires on August 15, 1981.

Evelyn L. Fry