

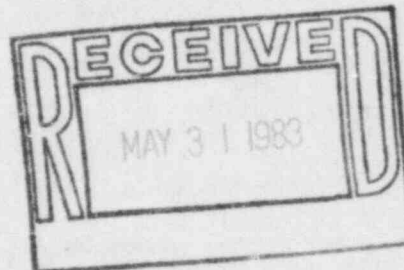


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

May 27, 1983

Mr. W.C. Seidle, Chief
Reactor Projects Branch 2
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 83-061

Re: Docket No. STN 50-482

Ref: 1) Letter STN 50-482/82-22, dated 2/23/83, from
WCSeidle, NRC, to GLKoester, KG&E

Ref: 2) Letter KMLNRC 83-035 dated 3/25/83, from GLKoester,
KG&E, to WCSeidle, NRC

Ref: 3) Letter STN 50-482/82-22, dated 4/27/83, from
WCSeidle, NRC, to GLKoester, KG&E

Subj: Supplemental Response to Inspection Report STN 50-482/82-22

Dear Mr. Seidle:

Reference 1) transmitted Inspection Report STN 50-482/82-22, to which a Notice of Violation (NOV) was attached. Kansas Gas and Electric Company's (KG&E) response to the NOV was provided in Reference 2). Reference 3) requested a supplemental response to provide additional information concerning KG&E's corrective action. This letter provides the additional information requested by Reference 3).

Violation 1. Failure to Properly Follow Procedures

Region IV Comment:

Our finding was that the receiving and maintenance instructions (RMIs) for the pressurizer and the steam generators were not followed. Your response stated that the requirements which had not been followed have been deleted. Your supplemental response should address actions to ensure compliance with all RMIs for safety-related equipment in order to avoid further violations.

KG&E Supplemental Response:

Special Receiving, Storage and Maintenance Instruction and Inspection Requirements (RMIs) W120 and W130 were not clear

8308090178 830729
PDR ADOCK 05000472
G PDR

May 27, 1983

as to whether or not paint touch-up was required once the equipment was moved inside. The Constructor's interpretation was the paint touch-up requirement was only intended to apply during outdoor storage. This interpretation was confirmed by a memo from Westinghouse on December 8, 1981. However, the RMIs were not revised at that time to reflect this clarification. Therefore, the Constructor was in compliance with the RMI as clarified by the December 1981 memo. The primary concern for this issue is that the RMI was not clear, and when clarification was obtained, the RMI was not revised to reflect the clarification. Corrective actions for adequacy and clarification of RMI requirements were provided in Reference 2, Page 4, under "Response".

In order to ensure compliance with all RMIs for safety-related equipment, KG&E will first verify that the corrective actions stated in Reference 2) are accomplished. KG&E will then conduct a surveillance after full compliance is achieved to ensure RMIs are being complied with.

Violation 2. Inadequate Quality Records

Region IV Comment:

Our finding was that the Equipment Maintenance Log for the pressurizer was not completed and signed as required by your procedures. Your supplemental response should address action to ensure that documentation requirements for maintenance on safety-related equipment are fulfilled.

KG&E Supplemental Response:

All maintenance records will be reviewed as part of the turnover documentation review. If safety-related equipment without proper maintenance documentation is found, it will not be turned over until the equipment is inspected, the inspection findings are resolved, and the inspection record added to the maintenance records.

Violation 3. Inadequate Corrective Action

Region IV Comment:

Our finding was that the corrective action taken in response to Corrective Action Report 1G0011 was inadequate. Your

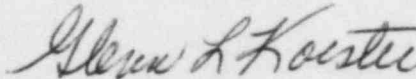
May 27, 1983

response included discussion of maintenance record reviews and a planned review of RMIs by an organization other than Daniel International. We agree that these reviews are appropriate, but we are concerned that your response did not address actions to improve the quality and timeliness of actions taken to resolve and correct conditions adverse to quality which are identified by the Kansas Gas and Electric Company and its contractors. Improvements in this area will likely be necessary to avoid future violations.

KG&E Supplemental Response:

1. Daniel Construction Procedure AP-VI-12, "Corrective Action", was revised (Rev. 2) on December 1, 1982 as a result of INPO Self-Initiated Construction Evaluation findings. This revision includes measures to assure more effective and timely corrective actions in response to Corrective Action Reports (CAR). Among these improvements are:
 - a) Requirements for the affected manager to provide a tentative corrective action plan and timetable to the Quality Manager for evaluation within four (4) working days of the CAR initiation. This is reviewed by Quality Engineering for effectiveness and timeliness.
 - b) The Project Quality Engineer performs a monthly investigation of all open CAR's to monitor progress against the corrective action commitments. The results of this investigation are reported to the Project Manager and Project Quality Manager. If either the effectiveness or timeliness of the actions during the month are inadequate, the Project Managers will take additional appropriate actions.
2. KG&E QA will perform an audit of the Daniel Corrective Action Program during the fourth quarter of CY1983. This audit will evaluate the effectiveness of these Daniel program enhancements.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:bb
cc: HRoberts/WSchum