

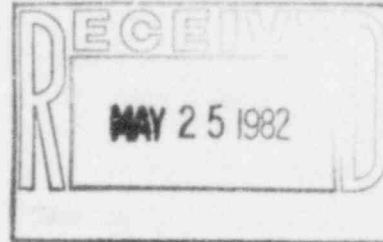


KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER
VICE PRESIDENT - NUCLEAR

May 21, 1982

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 82-202

Re: Docket No. STN 50-482/Rpt. 81-12

Ref: 1) Letter KMLNRC 81-111 dated 9/10/81 from GLKoester,
KG&E, to GLMadsen, NRC

2) Letter KMLNRC 82-173 dated 3/11/82 from GLKoester,
KG&E, to WCSeidle, NRC

Subj: Response to Inspection Report STN 50-482/81-12

Dear Mr. Seidle:

This letter is written in response to your letter of April 21, 1982, which transmitted Inspection Report STN 50-482/81-12. As requested, the violations documented in the report are being addressed in three parts:

- a) Corrective steps which will be taken and the results achieved;
- b) Corrective steps which will be taken to avoid further violations; and
- c) The date when full compliance will be achieved.

Each violation is addressed separately.

I. Violation A: Failure to Follow Procedures Relative to the Installation of Safety-Related Duct Work and Supports.

A. Finding:

1. Miscellaneous Structural Steel Weld Records (MSSWR) were issued to document completion and QC inspection of attachment welds on HVAC hangers from June 25 to mid-August, 1979,

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even though the Weld Control Record (WCR) form was issued on July 25, 1979, by DI Engineering Department for use as an HVAC traveler.

2. DI Quality Control Procedure VIII-200, Revision 0, entitled "Field Fabrication and Erection of Safety-Related Duct Work and Supports" was not issued until September 24, 1979, indicating that there was no written procedure for QC inspection from March 26, 1979, until September 24, 1979.

B. Response:

1. Corrective steps which will be taken and the results achieved:
 - a. Nonconformance Report (NCR) 1SN-3558-M* was generated and dispositioned to provide 100% reinspection and necessary rework and documentation of all hangers installed during the period 6/25/79 through 9/24/79.
 - b. This inspection will be accomplished in accordance with Construction Procedure QCP-VIII-200. Required rework will be performed and documented in accordance with approved procedures.

*Note: This NCR was converted to 120 individual Deficiency Reports (DRs) to facilitate more effective tracking.

2. Corrective steps which will be taken to avoid further violations:
 - a. Personnel involved with the installation and inspection of HVAC duct supports will be appropriately trained in the following procedures: WP-VII-209, WP-VIII-200, CWP-504, QCP-VII-200, QCP-VII-204, QCP-VII-504, QCP-VIII-200.
 - b. Procedure WP-VIII-200 has been revised to clarify and better define support installation and documentation requirements.
 - c. Additional actions include:
 - (1) Identification of Construction/Inspection activities which started prior to applicable procedures being issued;

- (2) Evaluation of the impact that any lack of procedures had on work performed;
- (3) Identification of Work and Quality Procedures which were not issued concurrently;
- (4) Evaluation of the impact that any lack of continuity had on work performed.

In addition, Construction Procedure AP-I-01 has been revised to require concurrent review and revision, if necessary, of Work and Quality Procedures when one or the other is revised.

3. Date when full compliance will be achieved:

- a. Full compliance will be achieved on May 27, 1982.

II. Violation B: Failure to Maintain Sufficient Records Relative to Installation of Safety-Related HVAC Hangers.

A. Finding:

Records were identified that did not furnish evidence of activities affecting quality in that they were fallacious. Examples of fallacious records were:

1. Data was transferred from the MSSWR form (which documents only attachment welds) to the WCR form (which documents the fabrication/QC inspection of the complete hanger) using hanger blueprints to identify the welds on each hanger with no visual confirmation that the welds had been completed.
2. Data was subsequently transferred from the WCR form to form Weld Control Record Supplement Sheet (WCRSS), which documents each individual weld on the respective hanger, with no valid record that the information on the WCR form correctly represented the fabrication and QC approval of a completed hanger.
3. Numerous conflicts were identified in the Control Room HVAC hangers where the welder identification numbers on hanger welds and the welder identification numbers on the associated WCR form and/or WCRSS form did not correspond.

B. Response:

1. Corrective steps which will be taken and the results achieved:

May 21, 1982

- a. NCR 1SN-3558-M was initiated and dispositioned to provide for 100% reinspection and any required rework of the subject hanger welds. The inspection will be accomplished in accordance with Construction Procedure QCP-VIII-200. Designated rework will provide valid documentation for each weld and assure proper welder identification.
2. Corrective steps which will be taken to avoid further violations:
 - a. Identification of Quality Inspection Forms, identification of revisions to forms where attributes were added, identification of the use of revised forms prior to issuance in revised procedures, identification of where two or more revisions of a form document a specific inspection and the evaluation of the impact on the work of any discrepancies identified.
 - b. Development of a procedure (AP-II-02) for the preparation of policy statements, issuance of a policy statement concerning the transfer of data, issuance of a policy statement concerning the importance of Quality Documentation, and development of a Quality Presentation on this subject to be presented to Craft and Quality personnel.
 - c. Thorough evaluation of the impact of uncontrolled transfer of information on inspection documentation and data transfer on HVAC traveler documents.
3. Date when full compliance will be achieved:
 - a. Full compliance will be achieved on May 27, 1982.

III. Violation C. Failure to Establish Adequate Measures Relative to the Identification and Correction of Conditions Adverse to Quality.

A. Finding:

DI Deficiency Report 1SD5455M, dispositioned on November 18, 1980, states in part, "Incorrect entries on WCRs and/or incorrect "D" stamping to be corrected under direction of craft supervision....". The "Action Taken" portion of DR 1SD5455M states, "Craft has been retrained and welding discrepancies corrected to reflect correct "D" stamps and weld number with corresponding traveler sheets."

Welding discrepancies had not been corrected to reflect correct "D" stamps and weld numbers with corresponding traveler sheets in that a reexamination of certain supports, i.e., R3349 on June 25, 1981, and R3240 on August 20, 1981, revealed that the welder "D" numbers did not correspond with the traveler sheets.

B. Response:

1. Corrective steps which will be taken and the results achieved:
 - a. NCR 1SN-3558-M was generated and dispositioned to provide 100% reinspection and any required rework of supports in question in accordance with Construction Procedure QCP-VIII-200. These actions will ensure adequate Quality records and that welder identification on supports agrees with the traveler records. DR 1SD9457MW was issued to address the welder identification conflict on support R3349 and DR 1SD8412MW was issued for support R3240.
2. Corrective steps which will be taken to avoid further violations:
 - a. Construction Procedure AP-VI-02, "Nonconformance Control and Reporting" has been revised to include the review of all NCR/DR dispositions for adequacy by Quality Engineering.
 - b. All personnel involved with the dispositioning of NCR/DRs will be indoctrinated in the cause and corrective action requirements of NCR/DR dispositions.
3. Date when full compliance will be achieved:
 - a. Full compliance will be achieved on May 27, 1982.

IV. Violation D. Failure to Establish Adequate Measures to Assure that Special Processes are Controlled and Accomplished by Qualified Personnel.

A. Finding:

Valid welder identification numbers were changed in September and October of 1979 to agree with erroneous Weld Control Records, thus eliminating their authenticity.

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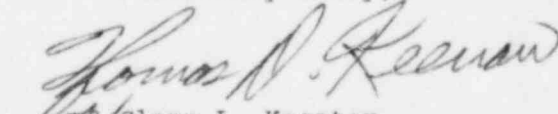
B. Response:

1. Corrective steps which will be taken and the results achieved:
 - a. NCR 1SN-3558-M was generated and dispositioned to provide for 100% inspection and necessary rework of the supports in question. These actions will ensure that the welder identification on the supports are correct and agree with the traveler records.
2. Corrective steps which will be taken to avoid further violations:
 - a. Work Procedure WP-VIII-200 was revised to clarify and better define the installation and documentation requirements for HVAC supports.
 - b. Personnel involved in the installation of HVAC supports will have appropriate training in the requirements of WP-VIII-200.
3. Date when full compliance will be achieved:
 - a. Full compliance will be achieved on May 27, 1982.

In addition to the aforementioned corrective actions, other program enhancement activities have been or are being implemented. These activities are additional actions precipitated by the documented violations. A total of seventeen enhancement activities are being implemented as a result of several related problems. Enhancement activities 3, 5, 11, 13, 15, 17 and 18, described in References 1 and 2, specifically relate to the four violations documented in the subject Inspection Report.

Please contact me if you have any questions concerning this response.

Yours very truly,


Glenn L. Koester
Vice President - Nuclear

GLK:bb

cc: Mr. Thomas Vandel
Resident NRC Inspector
P.O. Box 311
Burlington, Kansas 66839

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

AFFIDAVIT

I, Thomas D. Keenan, of lawful age, being duly sworn, hereby depose and state that I am Director - Nuclear Operations of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal for Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, and that I have been 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. 81-12; 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


Thomas D. Keenan

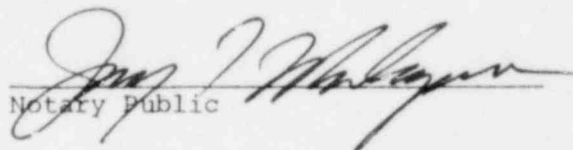
Director - Nuclear Operations

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

BE IT REMEMBERED that on this 21st day of May, 1982, before me, Jerry L. Malmgren, a Notary, personally appeared Thomas D. Keenan, Director - Nuclear Operations of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on 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 21st day of May, 1982.




Notary Public

My Commission expires on March 22, 1983.