

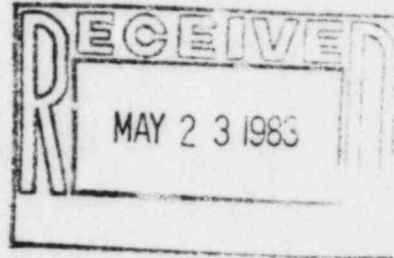


KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER  
VICE PRESIDENT - NUCLEAR

May 20, 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 83-057

Re: Docket No. STN 50-482

Subj: Response to Inspection Report STN 50-482/07

Dear Mr. Seidle:

This letter is written in response to your letter of April 22, 1983, which transmitted Inspection Report STN 50-482/83-07. As requested, the violation identified in the Inspection Report is being addressed in three parts:

- a) The 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.

Violation: Failure to Implement Quality Assurance Program Requirements

Finding:

10CFR Part 50, Appendix B, Criterion II, states, in part: "The Applicant shall establish at the earliest practical time ... a quality assurance program ... . This program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with these policies, procedures, or instructions ... . Management of other organizations participating in the quality assurance program shall regularly review the status and adequacy of that part of the quality program which they are executing."

The Wolf Creek Quality Assurance Program For Design and Construction

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Finding (continued):

Manual, paragraph 17.1.11, requires Daniel International Corporation (DIC) to establish a test program to control its testing activities. This program will cover all required tests including, where appropriate, prototype qualification tests, hydrostatic tests of pressure boundaries, in process tests of manufactured items, and proof tests prior to installation.

Contrary to the above, DIC does not have a formal program in place to control the performance of testing.

Response:

a) Corrective steps which have been taken and results achieved:

Specific Daniel procedures/activities identified through KG&E Surveillance and Audit have been or are in the process of being revised to include definitive test control criteria as required by Corrective Action Report (CAR) 1-G-0024.

These procedures are:

QCP-I-01, R/14\*  
QCP-VII-211, R/3\*  
QCP-X-304, R/5\*

WP-VII-211, R/9\*  
WP-X-304, R/8\*  
WP-XI-302, R/4\*

AP-VI-13, R/3

\*Approved and implemented

b) Corrective steps which will be taken to avoid further violations:

- (1) Daniel Construction Procedure AP-I-02, "Preparation, Review and Approval of Construction Procedures", will be revised to include more specific and definitive direction for preparation and processing construction procedures containing test activities.
- (2) Corrective Action Report 1-G-0024 will be revised to require each Daniel Discipline Manager to perform a review of construction work procedures within the scope of the given discipline to assure adequacy of the current testing program.

May 20, 1983

Response (continued):

This review will consist of verification that applicable criteria of the associated ANSI Standard (i.e., ANSI N45.2.4, N45.2.5, N45.2.8) as well as specification requirements have been included in the applicable work procedures. Daniel Quality Engineering will perform a similar review of quality control procedures (QCP's) to verify adequacy of current procedural requirements. This review will be coordinated with the work procedures review.

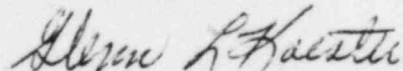
- (3) Should these reviews result in the determination that specific procedures are inadequate, procedural revisions will be initiated and implemented.
- (4) A review of procedures previously governing test activities will be conducted to evaluate the adequacy of test control criteria. Procedural inadequacies which render test results indeterminate or unacceptable will be documented on Nonconformance Reports in accordance with AP-VI-02.
- (5) Upon completion of the Constructor's corrective actions, Kansas Gas and Electric Company's (KG&E) Quality Assurance (QA) organization will verify completeness of the corrective actions. KG&E's QA organization will also determine the effectiveness of the corrective actions on subsequent scheduled audits/surveillances.

c) The date when full compliance will be achieved:

Full compliance will be achieved by July 15, 1983.

Supporting documentation for the responses provided above is available for review at the Wolf Creek job site. If you have any further questions concerning this response, please contact me or Mr. Otto Maynard of my staff.

Very truly yours,



Glenn L. Koester  
Vice President - Nuclear

GLK:bb

cc: HRoberts/WSchum