

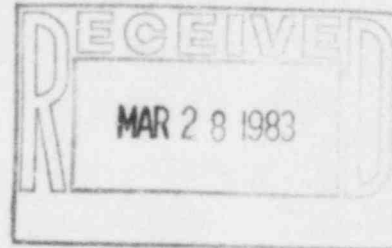


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

March 25, 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 83-035

Re: Docket No. STN 50-482

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

Dear Mr. Seidle:

This letter is written in response to your letter of February 23, 1983, which transmitted Inspection Report STN 50-482/82-22. As requested, the violations identified in the Inspection Report are being addressed in three parts:

- a) The corrective steps which have been 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 1. Failure to Properly Follow Procedures

Finding:

10CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by instructions or procedures, and shall be accomplished in accordance with these instructions or procedures.

The receiving and maintenance instructions for the steam generators (RMI-W-120) and the pressurizer (RMI-W-130) both require monthly inspection and paint (carboline) touch-up as needed.

Contrary to the above, the required paint touch-up has not been performed for the steam generators or the pressurizer since October 1980.

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Violation 1. Failure to Properly Follow Procedures

Response:

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

Special Receiving, Storage and Maintenance Instruction and Inspection Requirements (RMI's) W120 and W130 have been revised to delete the requirement for touch-up paint. This action is based on a memo from Westinghouse dated December 8, 1981 which confirms Daniel International Corporation's (DIC) interpretation that the paint touch-up requirement was only intended to apply during outdoor storage.

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

RMI's W120 and W130 have been revised to clarify that touch-up painting is not required during indoor storage.

- c) Date when full compliance will be achieved:

Full compliance was achieved by February 24, 1983.

Violation 2. Inadequate Quality Records

Finding:

10CFR Part 50, Appendix B, Criterion XVII requires, in part, "Sufficient records shall be maintained to furnish evidence of activities affecting quality. These records shall include at least the results of ... inspections, test ..."

Work procedures WP-I-01, Revision 11 requires completion and sign-off of the "Equipment Maintenance Log" upon completion of work activity.

Contrary to the above, from February 1, 1980, until August 19, 1980, and again from January 25, 1982, through September 20, 1982, there are no records of performance of required maintenance or inspections of the pressurizer and no records of inerting gas pressure.

Response:

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

Maintenance records for the former period February 1, 1980 through August 19, 1980 have been located. Daily field logs

were maintained and serve to verify daily nitrogen pressure readings on the pressurizer. Such daily logs include pressure readings up through June 5, 1980, at which time the readings were once again picked up on the maintenance logs. Nitrogen purge was released in July 1980 to allow installation of connecting piping to begin.

However, maintenance was not documented during the period from January 25, 1982 through September 20, 1982. A maintenance inspection report dated September 15, 1982 indicates the exterior of the pressurizer to be acceptable and this acceptable condition is reflected in subsequent maintenance logs.

An inspection conducted by KG&E, Westinghouse and DIC on December 22, 1982 indicated that the pressurizer was in a fully acceptable condition.

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

RMI W130 has been revised to include the following Westinghouse requirements:

"The inside of the pressurizer should be visually inspected every six months at a minimum to verify that surfaces are free of contamination. Contamination consists of any foreign material such as grit, metal particles, oil, grease, moisture, etc. Inspection should also note any other condition(s) on the interior or exterior that may be detrimental to pressurizer integrity. Results of all inspections shall be reported to Westinghouse Site Office.

NOTE: Visual Inspection of interior will not necessitate entry unless conditions are noted that require close examination."

c) Date when full compliance will be achieved:

Full compliance was achieved by February 24, 1983.

Violation 3. Inadequate Corrective Action

Finding:

10CFR Part 50, Appendix B, Criterion XVI requires that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Violation 3. Inadequate Corrective Action

Finding: (continued)

10CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by instructions or procedures, and shall be accomplished in accordance with these instructions or procedures.

Daniel International Corporation (DIC) Administrative Procedure AP-VI-12, "Corrective Action," requires the responsible managers to perform the corrective action as specified in the corrective action report.

Contrary to the above, in November 1981, the problem of inadequate maintenance requirements was identified in a Quality Engineering Surveillance Report. This problem was the subject of a Corrective Action Report (CAR) Number 1G0011 of November 17, 1981. Corrective action included a review of all records of completed maintenance and a review of all Receiving and Maintenance Instructions (RMI's) to assure compliance with all vendor requirements. These reviews were completed on November 29, 1982. Review of present RMI's and maintenance records show completion of these corrective actions to be inadequate.

Response:

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

RMI W130 for the Pressurizer and RMI W120 for the Steam Generators have been revised to assure applicable Westinghouse requirements have been incorporated. This action was controlled by NCR's 1SN7735M and 1SN7755M.

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

1. In future cases where vendor clarification is required, the vendor contact will be documented in accordance with approved site procedures (AP-III-03, AP-III-04).
2. Maintenance records generated after February 9, 1982, are being reviewed as they are completed (on a weekly basis).
3. Maintenance records generated prior to February 9, 1982, which have already been reviewed for turnover have had no major material deficiencies identified. Therefore, a concentrated effort will be applied to review maintenance records for Westinghouse supplied items only. The schedule for reviewing records will be based on criticality of the

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Violation 3. Inadequate Corrective Action

Response: (continued)

component and system turnover date. Maintenance records for items other than Westinghouse supplied will be reviewed prior to system turnover, lengthening the lead time prior to turnover as much as manpower permits.

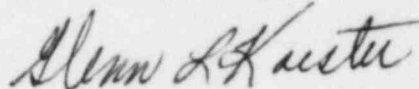
4. In addition, RMI's will be reviewed by a non-Daniel organization to verify compliance with applicable vendor manuals, codes and standards.

c) Date when full compliance will be achieved:

Full compliance will be achieved by September 16, 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.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:bb

cc: HRoberts/SSchum