



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

June 24, 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

JUN 27 1983

KMLNRC 83-080

Re: Docket No. STN 50-482

Subj: Response to Inspection Report STN 50-482/83-10

Dear Mr. Seidle:

This letter is written in response to your letter of May 6, 1983, which transmitted Inspection Report STN 50-482/83-10. As requested, the violation identified in the Inspection Report is 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

Finding: Failure to Prescribe Activities Affecting Quality by Procedure

10CFR50, Appendix B, Criterion V, requires in part that activities affecting quality shall be prescribed by instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures or drawings.

Paragraph 17.1.10 of the Wolf Creek Site Addendum to the Quality Assurance Programs For Design and Construction Manual states, in part, "The major contractors are

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Finding (Continued):

responsible to establish inspection programs which provide measures for: . . . Controlled inspection procedures, instructions and/or checklists being provided and containing the following . . . . Accept and reject criteria . . . ."

Contrary to the above, the major contractor, Daniel International Corporation (DIC), did not provide measures for controlled inspection procedures in that DIC Procedure No. QCP-X-302, "Installation of Electrical Raceway Supports" did not contain the intermittent weld configuration accept and reject criteria as required.

Response:

The NRC's Notice of Violation cites that DIC procedure QCP-X-302, "Installation of Electrical Raceway Supports" did not contain accept/reject criteria for intermittent fillet welds. QCP-X-302 is not intended to contain weld acceptance criteria. Intermittent fillet welds are inspected under DIC procedure QCP-VII-200, "Inspection of Welding Process." QCP-VII-200 does contain welding accept/reject criteria.

Electrical raceway support welding is to be performed at Wolf Creek to the requirements of AWS D1.1-75. The Architect/Engineer's installation specifications and the DIC inspection procedure (QCP-VII-200) both reference the AWS code for intermittent fillet weld requirements. QCP-VII-200 references the AWS code for weld acceptance criteria. However, due to code interpretation differences, electrical raceway supports were installed and quality accepted with intermittent fillet welds which did not start or terminate at the end of the support's dimensioned length.

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

The Architect/Engineer performed a design review of the non-conforming supports identified in the Notice of Violation (Nonconformance Report LSN9130EW), as well as those identified on Nonconformance Reports LSN10419EW, LSN10543EW, and LSN10350CW in dispositioning Field Change Request (FCR) 1-0060-W.

The review indicated that all of the affected supports were acceptable as reported. These details comprise all affected electrical supports shown on the C-0400 and C-0600 series drawings.

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A design review of all other conditions where intermittent welding was specified, which may have been affected by the conditions described in the FCR, has also been completed by the Architect/Engineer. The results of this design review indicate that no safety implications exist as a result of the reported condition. The reported condition does not, therefore, represent a safety concern and is acceptable on a technical basis. All intermittent fillet welding previously performed on the Wolf Creek site is acceptable with regards to weld increment.

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

The FCR was dispositioned on June 15, 1983, to require that for all future intermittent fillet welding a weld increment shall be located at the ends of the dimensioned length. DIC personnel involved in welding and inspection of intermittent fillet welding will be informed of the disposition of the FCR so that all such welding performed after June 15, 1983, will not be quality accepted without welds on the ends of the piece or appropriate disposition by the Architect/Engineer. All affected personnel will be so informed by June 28, 1983.

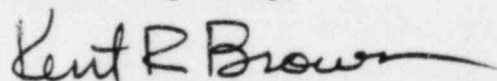
- c) Date when full compliance will be achieved:

Full compliance will be achieved by June 28, 1983.

MG&E Quality Assurance personnel will conduct a surveillance of intermittent fillet welding activities during calendar year 1983 to evaluate the effectiveness of the above corrective steps.

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,



for Glenn L. Koester  
Vice President - Nuclear

GLK:bb  
cc: HRoberts/WSchum