

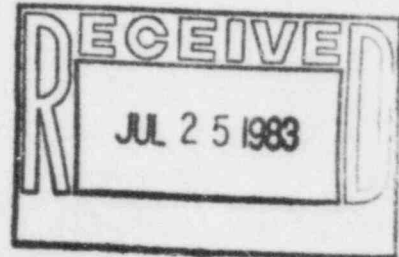


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

July 22, 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 83-096

Re: Docket No. STN 50-482

Subj: Response to Inspection Report STN 50-482/83-18

Dear Mr. Seidle:

This letter is written in response to your letter of June 23, 1983, which transmitted Inspection Report STN 50-482/83-18. As requested, the violation identified in the Inspection Report is being addressed in four (4) parts:

- a) The corrective steps which have been taken and the results achieved;
- b) Corrective steps which will be taken to avoid further violations;
- c) The date when full compliance will be achieved; and
- d) Response to specific questions.

Violation: Improper Substitution of Material in Safety-Related Pipe Hanger

Finding:

10CFR50, Appendix B, Criterion VIII requires that, "Measures shall be established for the identification and control of materials, parts, and components, including partially fabricated assemblies. These measures shall assure that identification of the item is maintained by heat number, part number, serial number, or other appropriate means, either on the item or on records traceable to the item, as required throughout fabrication,

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Finding (continued):

erection, installation, and use of the item. These identification and control measures shall be designed to prevent the use of incorrect or defective material, parts, and components."

Contrary to the above, Piece 2 of Hanger BG04-C033 was removed on March 16-17, 1981, and replaced with scrap material which had been stamped with a heat number and hanger number to duplicate the numbers on the original piece.

Response:

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

Suspect material (i.e., Piece 2 of support BG04-C033) was removed during the investigation and turned over to the NRC Investigator. The remainder of the support has been removed and refabricated to assure that all pieces are traceable.

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

The subject support was one (1) of 129 identified and re-inspected as part of the Corrective Action in response to the original identification of material substitutions in an allegation to the NRC in the spring of 1981 (see NRC Report No. 81-08). This reinspection included the following elements:

1. Verification that the welder identification was stamped on the support and that the welder identified was qualified for the weld procedure prescribed.
2. Verification that the material heat number was stamped on the support and that the heat number identified was traceable (i.e., a valid number in the safety-related heat log).
3. Identification of any weld or material defects.

Reinspection of all 129 supports has been completed and all deficiencies identified have been resolved using 16 Deficiency Reports (DR's). In addition, the foreman involved was terminated.

Response (continued):

- c) Date when full compliance will be achieved.

Support BG04-C033 was refabricated and final QC installation inspection was performed on July 15, 1983.

Reinspection and any necessary rework on the 129 supports installed by the foreman in question was completed November 12, 1982.

- d) Response to specific questions.

1. Has hanger BG04-C033 been reworked with traceable material?

Yes. Support BG04-C033 has been totally removed and refabricated to assure all pieces are traceable. This was completed July 15, 1983.

2. Was hanger BG04-C033 reinspected in the summer of 1981 following identification of another counterfeit hanger? If it was, please explain why its degraded condition was not identified by that inspection.

Support BG04-C033 underwent the reinspection described above on April 21, 1981 (36 days after the alleged material substitution and heat number transfer took place). The reinspection checklist indicates that Piece 2 was die-stamped with 1/4" punch lettering indicating a material heat number of 170C961. This heat number appears in the safety-related heat log as acceptable for W4X13 Beam Stock, Grade A36 from Bethlehem Steel purchased on Daniel P.O. 7158-SR15007.

As a result of the heat number in question being on the steel and indicated as being acceptable in the heat log, the Inspector performing the reinspection had no reason to doubt its validity. The reinspection of this support did, however, identify 6 weld defects which were addressed on DR 1SD6646M (closed September 28, 1981).

3. Has KG&E assured that no other hangers in safety-related systems have been degraded by improper material substitution?

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KG&E performed an extensive investigation in response to this concern when originally identified in the spring of 1981. All supports installed by the foreman in question have been reinspected and reworked when discrepancies were identified. The NRC's review of this reinspection activity was summarized in NRC Report 81-08 (Vandel and Gagliardo) dated July 21, 1981, which states in part,

" . . . The inspections of these hangers were performed by DI QC inspectors. The inspectors were provided with special checklists to document the heat numbers of each piece (for material traceability), the welder ID numbers, and dimensions of the weld (actual and as indicated on the drawings). . . "

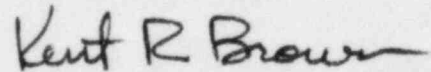
"The NRC inspector's independent review essentially verified the results of the QC inspection. The differences were not significant and will be resolved in the corrective action committed to by the licensee."

"Interviews with the QC inspectors, who performed the inspections, substantiated the stated scope and depth of the inspection effort. The results of the interviews added credence to the licensee's contention that the improperly fabricated hanger was an isolated case . . . "

In summary, KG&E has taken necessary corrective actions, including extensive reinspection, required rework and removal of personnel identified as directing these improper material substitutions. No subsequent allegations, interviews, or hardware and documentation examinations have identified this problem to any other supports nor implicated any other crew.

Please contact me or Mr. Otto Maynard of my staff if you have any questions concerning this response.

Yours very truly,



for Glenn L. Koester
Vice President - Nuclear

GLK:bb

cc: HRobertds/WSchum