

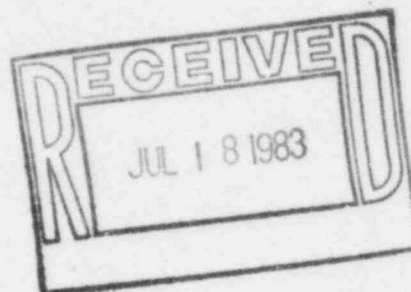


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

July 15, 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 83-091

Re: Docket No. STN 50-482

Subj: Response to Inspection Report STN 50-482/83-14

Dear Mr. Seidle:

This letter is written in response to your letter of June 15, 1983, which transmitted Inspection Report STN 50-482/83-14. 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 Provide Procedures for Startup Activities

10CFR Part 50, Appendix B, Criterion V, states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

The Wolf Creek Operations Quality Assurance Manual Section 17.2.5.4,

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Finding (continued):

"Operations Documents" requires: "The Wolf Creek Generating Station (WCGS) staff and other divisions shall provide written procedures and drawings as required for the operating phase. . . ." (The Wolf Creek Operations Quality Assurance Program (WCOQAP) is invoked during startup activities).

Contrary to the above, on May 18, 1983, KG&E Startup realigned the (NK) 125 volt DC Class 1E system. The RRI observed that all four NK busses were being fed from one battery charger. No procedure was available for this operation. The systems were being aligned to support repairs to the other battery chargers. All alignment was being done by the Startup engineer without a procedure or any of the controls of a planned procedure.

Response:

KG&E Startup Administrative Procedure ADM 14-405, "Temporary Modification Control" is the controlling procedure for temporary modifications such as described in the violation. This procedure was revised by Administrative Change Notice (ACN) 002 issued on May 24, 1983, to require additional authorization and implementation controls for temporary modifications. These additional controls are now implemented when temporary modifications change system design operating characteristics or could impact system chemistry.

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

ADM 14-405 was revised by ACN 002. The revised procedure requires review and concurrence of an authorizing document before certain temporary modifications are put in place. These additional measures provide added assurance that temporary modifications are applied in a controlled and properly authorized manner. Construction Work Permit NK-89-E was issued on May 24, 1983, to provide additional documented authorization and direction for the temporary NK system realignment.

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

All corrective steps are described above.

Mr. W.C. Seidle  
KMLNRC 33-091

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July 15, 1983

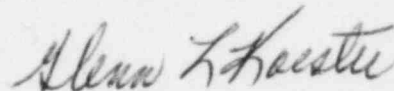
Response (continued):

c) Date when full compliance will be achieved:

Full compliance was achieved on May 24, 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. Gene Rathbun of my staff.

Yours very truly,



Glenn L. Koester  
Vice President - Nuclear

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cc: HRoberts/WSchum