

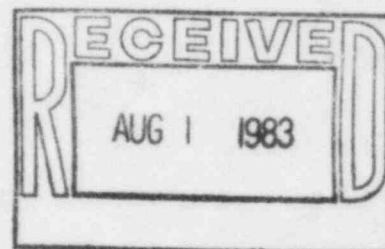


KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER
VICE PRESIDENT - NUCLEAR

July 29, 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 83-100

Re: Docket No. STN 50-482

Ref: 1) Letter KMLNRC 83-019, dated March 2, 1983 from

GLKoester, KG&E, to JTCollins, NRC

2) Letter KMLNRC 83-045, dated April 21, 1983 from

GLKoester, KG&E, to RCDeYoung, NRC

Subj: Wolf Creek Generating Station System Turnover Quality
Action Plan

Dear Mr. Seidle:

As discussed recently with you and Mr. Gagliardo, we are implementing certain additional management initiatives to increase our assurance that the quality objectives for our Wolf Creek Generating Station will receive additional emphasis. These plans were presented to your Resident Inspectors on Monday, July 18, as you requested.

The additional management initiatives consist of the following actions and/or changes to existing plans:

- 1) Acceptance inspections of the DIC (Daniel) scope of work for systems, subsystems and components released prior to turnover to Startup.

The existing plan consists of DIC performing its in-process inspections followed by a final inspection prior to submittal to KG&E Construction Management for its Construction/Startup acceptance inspection. DIC will continue to perform its in-process inspections through completion of a specific work scope; however, we are modifying the final acceptance inspection activity as follows:

Instead of the series approach of first the DIC final inspection and then the KG&E Construction/Startup final inspection, DIC and KG&E will conduct a joint final

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inspection. Authority and accountability for the joint final inspections will be maintained separate with KG&E retaining final authority. Unacceptable elements of the work will be returned to the DIC Quality process for corrective action.

The above modification will provide KG&E the opportunity to enter the completion inspection process earlier and at a level of detail that will provide for more prompt identification of problems and entry into the DIC corrective action program. This approach will also result in one exception list of common data and wording for improved communications. The identified exceptions will be tracked through to satisfactory resolution and will provide high visibility to both DIC and KG&E management regarding the level of performance being achieved. This will provide improved information for senior project management for management involvement, guidance and follow-up on corrective actions as might be required.

This plan modification will be implemented on safety-related systems and will be continued until quality results demonstrate that this extra effort by KG&E can be reduced, or terminated.

KG&E QA will continue its verification functions as currently performed; however, QA's final verification function will be conducted prior to system turnover to startup, rather than after turnover. On systems now turned over to startup, the QA verifications will be completed on a priority compatible with the schedule for conduct of pre-operational tests.

- 2) Consolidation of DIC and KG&E Construction QC personnel into one Combined Review Group for the final review and acceptance of DIC Construction quality documentation.

The Combined Review Group will report to DIC senior management; however, KG&E will place lead personnel in three of the work disciplines --- welding, including piping and piping hangers, electrical and civil. In the other two work disciplines --- piping/mechanical and material receiving --- KG&E personnel will be assigned to the assistant lead positions. The Combined Review Group will be made up of approximately 50% DIC personnel and 50% KG&E personnel.

As an additional check on the effectiveness of the above modified approach, the KG&E Construction QC Group will continue to perform spot check verifications of the documentation accepted by the Combined Review Group to provide additional assurance of program effectiveness. KG&E QA will continue its Quality Assurance program activities on this work.

The above-modified approach will increase KG&E management involvement at an earlier time and at a detail level in the review process, thus providing early awareness of potential problems so that prompt and adequate corrective actions can be taken. This approach also results in the production of one exception list which will be tracked to satisfactory resolution. Additionally, the improved communications will enhance the quality and efficiency of this final review process.

- 3) We are changing the Hanger Assessment Group from reporting to KG&E Construction to Bechtel Project Engineering's Assistant Project Engineer in residence at the Site. Although this group now consists of Bechtel engineering personnel, we believe it to be more appropriate and quality effective to have this group under the technical direction of Bechtel Engineering.
- 4) Completion of documentation review of DIC Construction of pipe and supports prior to turnover to Startup.

Our present approach requires that the quality documentation review for all pipe pressure boundary elements, including welded attachments and non-pressure boundary elements to be complete prior to turnover. We are changing our approach to allow the documentation review for non-pressure boundary support elements to be completed after turnover. Although this approach presents some economical risk should we have to rework certain supports, we consider it a prudent management approach to allow us to move forward in a timely manner with the pre-operational test program. The documentation not reviewed prior to turnover will be identified as an exception for each support assembly and then scheduled and tracked to satisfactory closeout prior to the start of hot functional integrated testing. To provide a contingency to the timely completion of this work, we have set an arbitrary completion deadline of 30 days prior to the start of hot functional testing.

We will also apply this same approach to the review of documentation on supports for HVAC systems.

- 5) I&E Bulletin 79-14 Pipe Configuration - Supports inspection walkdown and associated engineering adequacy evaluation.

Bechtel Project Engineering will conduct walkdowns in order to have the engineering organization who performed the

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analysis and the design and who is familiar with the intended design functions of this walkdown. In addition to this inspection activity serving as an additional check on the adequacy of construction, it also provides our engineer with an additional check of his analysis and design ... both of which will provide added assurance on quality and on high unit load factor and availability.

We will also perform this activity on certain safety-related systems not included in the scope of the 79-14 program and non safety-related systems that are important to achievement of high unit load factor and availability and on selected portions of our radwaste systems to minimize potential maintenance problems during plant operation.

6) Final acceptance criteria.

In the past various organizational elements of our overall project structure have been making a multiplicity of interpretations of Bechtel's specifications and approved construction drawings.

This has resulted in each organizational element creating its own acceptance inspection criteria. To resolve this inefficient approach, we have requested that Bechtel Engineering select from their various drawings and specifications the important quality characteristics criteria that should be used in the acceptance inspection process. Bechtel has completed this selection for pipe, pipe supports, mechanical equipment and electrical. Bechtel is completing this selection for the remaining civil work. This effort establishes standard inspection criteria and removes personnel in the various organizational elements from acting in the role of our engineer. This modification in approach will provide significant benefits to our quality program by placing additional emphasis on major quality characteristics and reducing emphasis on minor quality characteristics.

The above Bechtel effort applies to both inspections of hardware and review of quality documentation.

We believe the above management initiatives will provide significant benefits to our quality program in the final phase of the project. In addition to the added emphasis placed on our first project objective of obtaining a safe and reliable operating unit, we also expect schedule and cost benefits from re-emphasizing the "Do it right the first time" fundamental of management.

Mr. W.C. Seidle
KMLNRC 83-100

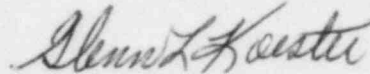
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We believe these initiatives are critical and prudent and will enhance our overall quality program as we prepare the unit for safe and reliable operation.

We want to express our appreciation to you and your Resident Inspectors for your constructive observations and comments.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:bb

cc: RCDeYoung

HRoberds/WSchum

KRBrown/WCadman

DTMcPhee

JMulholland