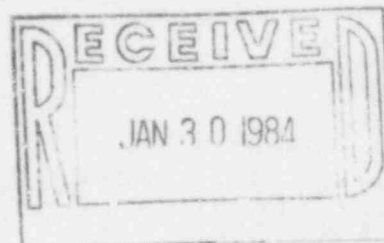




KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER
VICE PRESIDENT - NUCLEAR

January 27, 1984



Mr. Richard P. Denise, Director
Division of Resident, Reactor Project
and Engineering Programs
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

KMLNRC 84-009

Re: Docket No. STN 50-482

Ref: Letter KMLNRC 83-162 dated 12/9/83 from GLKoester,
KG&E, to JEGagliardo, NRC

Subj: Response to Inspection Report STN 50-482/83-38

Dear Mr. Denise:

This letter is written in response to Mr. Gagliardo's letter of December 29, 1983, which transmitted Inspection Report STN 50-482/83-38. As requested, the deviation and two 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 deviation (violations); and
- c) The date when full compliance will be achieved.

DEVIATION 482/8338-01: Preoperational Test Procedures

Finding:

The Final Safety Analysis Report (FSAR) for the Wolf Creek Generating Station (WCGS), Chapter 14, Revision 10, paragraph 14.2.3.2, "Test Procedures" states, in part: "The initial test program is conducted in accordance with detailed preoperational and initial startup test procedures. The SNUPPS Utilities maintain the overall responsibility for test procedure preparation,

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Finding (continued):

review, and approval during the preoperational stages. Each utility is responsible for final procedure revision, review and approval. These activities should be completed in a timely fashion to ensure that the approved procedures for satisfying FSAR testing equipment commitments are available for review approximately 60 days prior to scheduled implementation or fuel load for preoperational and initial startup tests, respectively."

In deviation from the above, the following preoperational test procedures were not available for review the required time prior to scheduled performance:

- * SU3-KE06 - Refueling Machine Indexing
- * SU3-BB01 - Reactor Coolant Pump Initial Operation
- * SU3-BB11 - Reactor Coolant System Hydrostatic Test
- * SU3-BG01 - Chemical and Volume Control System Major Component Test

Response:

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

As identified in the Reference, the following actions have been taken:

1. The establishment of the Startup Technical Support Group to provide focus on the preparation and approval of FSAR committed tests.
2. Increased Startup Engineer staffing in other Startup Groups, thereby augmenting KG&E's procedure writing capability.
3. Enhanced procedure preparation visibility, tracking and expediting. These efforts include enhanced draft procedure review and approval techniques.

These efforts have resulted in test procedures being available for review approximately 60 days prior to scheduled implementation of the test.

Response (continued):

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

Increased KG&E Management attention to the area of pre-operational test procedures will be continued to assure that corrective steps which have been taken continue to be effective. This includes:

1. Assuring high visibility of the test procedure preparation schedule;
2. Reviewing actual progress against scheduled progress;
3. Assuring procedure preparation is aggressively pursued, tracked and expedited; and
4. Assuring procedure quality is maintained at a high level.

- c) Date when full compliance will be achieved:

The required Preoperational Test procedures are now being made available for review approximately 60 days prior to scheduled implementation of the test.

VIOLATION 482/8338-02: Failure to Properly Control Procedure Revisions

Finding:

10CFR Part 50, Appendix B, Criterion V, requires, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances..."

Contrary to the above, Kansas Gas and Electric Company (KG&E) failed to provide a procedure to adequately control issuance of revisions to procedures. Specifically, Administrative Procedure (ADM) ADM 01-004, "Superintendent of Operations, Responsibilities and Duties", Revision 1 was issued as Revision 1 twice; once dated August 24, 1983 and again on October 20, 1983.

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Response:

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

The Plant Safety Review Committee (PSRC) Clerk for Kansas Gas and Electric Company discovered the duplicate Revision 1 to Administrative Procedure, ADM 01-004, "Superintendent of Operations, Responsibilities and Duties", shortly after the second Revision 1 was issued for distribution.

After the PSRC Clerk discovered this error, she immediately sent a transmittal to the previous distribution with instructions to destroy the procedure revision dated October 20, 1983.

All of these transmittal returns have been accounted for by the PSRC Clerk.

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

A revision to ADM 07-100, "Preparation, Review, Approval and Distribution of WCGS Procedures" has been initiated to reflect that all change forms will be routed or given to the PSRC Clerk for tracking or Word Processing. This tracking should prevent any duplicate revisions being issued on plant procedures.

Additionally, an Independent Quality Review of procedures prior to their issuance has been implemented. This Independent Quality Review is performed by checking the procedure to be issued against several quality attributes. If any problems are noted during this review, the problem must be resolved prior to issuance by the PSRC Clerk. No procedure may be issued without this Independent Quality Review.

- c) Date when full compliance will be achieved:

Full compliance will be achieved by January 31, 1984.

VIOLATION 482/8338-03: Failure to Follow Procedures

Finding:

10CFR Part 50, Appendix B, Criterion V, states, in part, that "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."

Wolf Creek Generating Station (WCGS) Procedure ADM 14-202, Revision 3, "Joint Test Group (JTG)," requires that an alternate chairman be designated in writing and that the designated alternate will attend meetings when the principal is not available.

Contrary to the above, on November 23, 1983, the JTG was convened without the proper chairman or his designated alternate.

Response:

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

The Test Change Notice #002 to Preoperational Test Procedure SU4-CG01, Revision 0, "Condenser Air Removal System", which was reviewed and approved at the Joint Test Group (JTG) Meeting, November 22, 1983, was reviewed and approved by the JTG on December 5, 1983 with proper membership and chairmanship in attendance.

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

Wolf Creek Generating Station Administrative Procedure ADM 01-002, "Plant Safety Review Committee" has been revised to include Attachment 002-1, "Joint Test Group". This attachment provides the charter for the JTG since it is a subcommittee of the Plant Safety Review Committee. In addition, this revision provides provisions for convening a JTG Meeting in the absence of the Chairman or his designated alternate, without the chairman issuing a letter changing his alternate. This revision permits the permanent Chairman of the PSRC to call and conduct a JTG Meeting in the absence of the JTG Chairman and Alternate Chairman, providing the required quorum requirements are met. If the JTG quorum requirements cannot be

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met, a PSRC Meeting may be called to handle JTG business by the permanent PSRC Chairman, or assigned alternate in his absence.

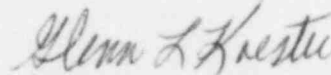
This revision to ADM 01-002 has been reviewed and approved by the PSRC and is now consistent with PSRC subcommittee requirements. This should resolve unresolved item 482/8338-04. ADM 14-202 was deleted upon approval and issuance of ADM 01-002.

c) Date when full compliance will be achieved:

Full compliance has been achieved.

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

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:bb

cc: WSchum