

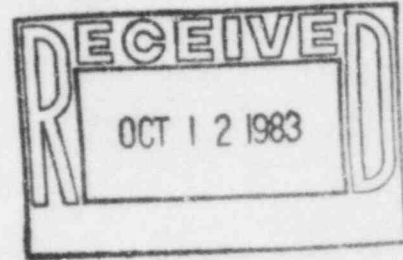


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

October 7, 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 83-128  
Re: Docket No. STN 50-482  
Subj: Response to Inspection Report STN 50-482/83-12

Dear Mr. Seidle:

This letter is written in response to your letter of August 26, 1983, which transmitted Inspection Report STN 50-482/83-12. Some of the information necessary to determine corrective action was not available within 30 days of the subject Inspection Report date. Therefore, on September 23, 1983, Mr. Otto Maynard of Kansas Gas and Electric Company and Mr. William Johnson of the Nuclear Regulatory Commission, Region IV, agreed to extend the response due date to October 7, 1983. As requested, the 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 violations; and
- c) The date when full compliance will be achieved.

VIOLATION 50-482/83-12-01

Finding:

10CFR50.55a(3) requires that reactor coolant pressure boundary piping meet the ASME III Boiler and Pressure Code. The ASME III Code directs that radiography be performed in accordance with ASME V Code. The ASME V Code, Article 2, paragraph T-263.1, Placement of Penetrameters, requires that, where feasible, the penetrometer must be placed adjacent to the weld.

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Finding (continued):

Contrary to the above, on or before June 6, 1983, Dravo Corporation Pipe radiograph 950-D, had penetrameter placed in the weld area at sectors 1-2 and 2-1.

Response:

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

Nonconformance Report (NCR) 1SN11652PW was issued to identify and disposition the subject weld and radiograph. (Note: Violation 50-482/83-12-01 identified the subject radiograph as Radiograph 950-D; actual number is Radiograph 439-D). The weld in question was radiographed and accepted on GEO Report PBT-RT-10675 on 6/16/83. The NCR was closed on 9/1/83.

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

KG&E QA reported on Surveillance Report S-669 dated 7/13/83 that a review of the available Dravo radiographs found no other nonconformances. Additionally, in August 1980, the GEO Level III inspector reviewed radiographs for 579 Dravo welds, and none of these were rejected for improper penetrameter placement. Based on the above investigations, KG&E concludes that this violation is an isolated incident (occurrence) requiring no additional corrective action.

- c) Date when full compliance will be achieved:

All corrective actions have been completed.

VIOLATION 50-482/83-12-02

Finding:

10CFR50.55(a) requires that reactor coolant pressure boundary piping meet the ASME III Boiler and Pressure Vessel Code. The ASME III Code, paragraph NB-5300, requires that unacceptable weld defects be removed or reduced to an acceptable limit. It further defines unacceptable discontinuities as any elongated indication exceeding specified lengths.

Finding (continued):

Contrary to the above, on or before June 6, 1983, the reactor coolant pressure boundary weld F-104, pipe line RC-06-BCR-29, was determined to have elongated indications which exceed the specified lengths which were erroneously accepted on Nonconformance Reports ISN3207MN and ISN2950M.

Response:

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

Nonconformance Report (NCR) 1 SN-11664-PW has been issued to document the questionable weld indications and to track the resolution of the identified weld concerns. Additional radiography has been performed using special radiography techniques to aid in the weld evaluations.

Three different exposures were made for weld F-104R-1 and one exposure appeared to exhibit a questionable indication. Westinghouse has recommended that this indication be removed for this weld.

Welds F-204, F-305 and F-405R-2 are currently under evaluation. Additional radiography may be required before a final disposition can be made for these welds.

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

Weld F-104R-1 will be reworked to remove the questionable indication. The evaluation of welds F-204, F-305, and F-405R-2 will be completed and reworked as necessary.

In addition to the corrective actions being taken to resolve the questionable weld indications, Daniel International Corporation will revise Construction Procedure AP-VI-05. This revision will require all final NDE results for welds/base metal, not within Daniel's scope of responsibility and having unacceptable indications, to be documented on NCRs and forwarded to the appropriate design organization for disposition.

NCRs are not normally generated when the condition in question has already been dispositioned "Accept-as-is" on a previous NCR. It is, however, appropriate to "re-evaluate" the condition when subsequent work has been performed which may adversely affect the condition and invalidate the original acceptance.

October 7, 1983

Response (continued):

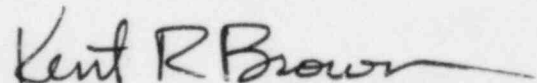
In the case cited by the subject Inspection Report, new NCRs should have been generated when the final code radiographs were complete so that Westinghouse could evaluate the final weld configuration. Procedure AP-VI-05 will be revised to clarify that nonconformances cannot be accepted on the basis of previously dispositioned NCRs if the nonconformance has been or could have been altered by subsequent work.

c) Date when full compliance will be achieved:

The evaluation of welds F-204, F-305 and F-405R-2 and the revision of AP-VI-05 will be completed by November 30, 1983. The rework of weld F-104R-1 and any rework identified for weld F-204, F-305 and F-405R-2 will be completed prior to primary hydrostatic testing.

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: WSchum/ASmith