

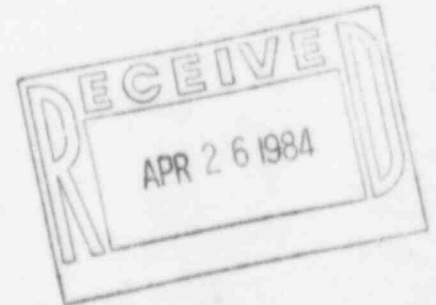


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

April 24, 1984

Mr. E.H. Johnson, Acting Chief
Reactor Project Branch 2
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 84-068
Re: Docket No. STN 50-482
Subj: Final 10CFR50.55(e) Report -
Discrepancies in the BN System

Dear Mr. Johnson:

Attached is Kansas Gas and Electric Company's final report submitted pursuant to 10CFR50.55(e) concerning discrepancies identified in the Borated Refueling Water System (BN) Turnover Exception List.

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

Yours very truly,

Glenn L. Koester

GLK:bb
Attach

xc:RCDeYoung, w/a
PO'Connor, w/a
WSchum, w/a

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FINAL REPORT
on
Discrepancies in the BN System
at
Wolf Creek Generating Station

Kansas Gas and Electric Company
April 24, 1984

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I. INTRODUCTION

In October 1982 the Borated Refueling Water Storage (BN) System was turned over from the Wolf Creek Constructor to the Kansas Gas and Electric Company (KG&E) Startup organization. During a subsequent surveillance conducted in December 1982 and January 1983 by the KG&E Quality Assurance organization, several discrepancies were identified between the Turnover Exception List and the installed BN system hardware. At that time, the identified deficiencies were evaluated for reportability and it was determined that none of the hardware deficiencies were significant safety concerns. The discrepancies did, however, point out that deficiencies existed in the turn-over process. Therefore, after subsequent evaluation of the turn-over process and discussions with the Nuclear Regulatory Commission, KG&E reported the Surveillance Report findings as a potential 10CFR50.55(e) on January 21, 1983.

For consistency, KG&E has carried this 10CFR50.55(e) under the title of "Discrepancies in the BN System". However, the deficiency actually addressed in this report is a deficiency in the turn-over program which resulted in an inaccurate Turnover Exception List for safety-related systems. The BN system was the first system in which these inaccuracies were identified.

KG&E had originally intended to wait until all hardware deficiencies identified as a result of the corrective actions discussed in Section V of this report had been evaluated before providing a final report on this subject. (See Reference II.G.) However, the actual deficiency reported was a program problem that could have potentially resulted in significant hardware problems. The hardware discrepancies such as the one identified in Reference II.G have been reported and tracked as individual potential 10CFR50.55(e)'s. Therefore, this report is submitted as the Final Report on deficiencies in the turnover program.

II. REFERENCES

- A. KMLNRC 83-016 dated 2/17/83 from GLKoester, KG&E, to WCSeidle, NRC.
- ✓B. KMLNRC 83-019 dated 3/2/83 from GLKoester, KG&E, to JTCollins, NRC.
- ✓C. KMLNRC 83-045 dated 4/21/83 from GLKoester, KG&E, to RCDeYoung, NRC.
- D. KMLNRC 83-050 dated 4/25/83 from GLKoester, KG&E, to WCSeidle, NRC.
- E. KMLNRC 83-077 dated 6/24/83 from GLKoester, KG&E, to WCSeidle, NRC.
- ✓F. KMLNRC 83-100 dated 7/29/83 from GLKoester, KG&E, to JTCollins, NRC.
- G. KMLNRC 83-124 dated 9/28/83 from GLKoester, KG&E, to WCSeidle, NRC.

III. DESCRIPTION OF THE DEFICIENCY

The turnover program for safety-related systems was deficient in that Turnover Exception Lists were not accurately documenting all deficiencies in the systems being turned over to the Startup organization. The following examples are typical of the types of deficiencies not accurately documented on the Turnover Exception List for the BN system:

1. A hanger had a missing weld that was not documented.
2. Two sway struts were misaligned and this condition had not been documented.
3. Two component supports were indicated as complete on the Turnover Exception List, when in fact, one had temporary members and one had not been installed.
4. Four pieces of small pipe did not have a heat number etched in the pipe. This was not carried as a hardware problem on the Turnover Exception List.

These types of discrepancies in the Turnover Exception List resulted in KG&E accepting safety-related systems without having an accurate accounting of all deficiencies.

IV. ANALYSIS OF SAFETY IMPLICATIONS

The hardware deficiencies originally identified (such as the hanger with the missing weld and the misaligned sway struts) were evaluated and it was determined that safety would not have been compromised had they gone uncorrected. Most of the items not documented on the Turnover Exception List were documented on other lists and would have been caught at a later date. However, the fact remains that program deficiencies did exist in the turnover process. These program deficiencies resulted in incomplete Turnover Exception Lists for safety-related systems. Therefore, it is possible that safety of operations could have been affected adversely had KG&E not taken the corrective actions discussed in Section V of this report.

V. CORRECTIVE ACTIONS

The deficiencies in the Constructor's turnover program for safety-related systems resulted in NRC Enforcement Action against KG&E. The corrective actions have been documented in previous correspondence to the NRC addressing the Enforcement Action. References II.B., II.C., and II.F. provided full details of the actions KG&E took to correct the deficiencies in the turnover program for safety-related systems. These References also described the actions KG&E took to identify and correct any deficiencies in safety-related systems which had previously been turned over.