KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER
VICE PRESIDENT - NUCLEAR

March 30, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

KMLNRC 84-046
Re: Docket No. STN 50-482
Ref: NUREG-0881, Wolf Creek Safety Evaluation Report
Subj: Confirmatory Issue B.28 (III.D.1.1)

Dear Mr. Denton:

The Referenced document identified Confirmatory Item B.28/ III.D.1.1 (Integrity of Systems Outside Containment Likely to Contain Radioactive Material) which required additional information concerning a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids in a post-accident situation.

Transmitted herewith is a description of the program needed to resolve this issue. This information is hereby incorporated into the Wolf Creek Generating Station, Unit No. 1, Operating License Application.

Yours very truly,

Glenn L Koester

GLK:bb
Attach
cc: PO'Connor (2)
WSchum

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OATH OF AFFIRMATION

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

I, Glenn L. Koester, of lawful age, being duly sworn upon oath, do depose, state and affirm that I am Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal, know the contents thereof, and that all statements contained therein are true.

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:

E.D. Prothro

E.D. Prothro, Assistant Secretary

By Glenn L. Koester
Glenn L. Koester
Vice President - Nuclear

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

BE IT REMEMBERED that on this 30th day of March, 1984, before me, Evelyn L. Fry, a Notary, personally appeared Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on behalf of and as the act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the date and year above written.

EVELYN L. FRY
NOTARY
PUBLIC

Evelyn L. Fry
Evelyn L. Fry, Notary

My Commission expires on August 15, 1984.

WOLF CREEK GENERATING STATION

PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT

This defines Kansas Gas and Electric's program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program is in support of NUREGs 0737, 0881, and 0830 and will fulfill the requirements of the Wolf Creek Generating Station FSAR and Technical Specifications. The systems considered include the recirculation portion of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, Residual Heat Removal System and Nuclear Sampling System (PASS only). The program is as follows:

1. General Practical Leak Reduction Measures

   The Operations Department will develop procedures which will govern the monitoring of specific systems to maintain as low a leak rate as practical, and make periodic inspections of affected systems.

   Maintenance as directed by Work Requests, will perform repair/rework on all components as needed to correct leaks as they are detected.

2. Periodic Visual Inspection

   In accordance with Wolf Creek Generating Station (WCGS) Administrative Procedures, the Operations Department is tasked with the responsibility of inspecting all the recirculation portions of the containment Spray System, Safety Injection System, Chemical and Volume Control System, Residual Heat Removal System and Nuclear Sampling System (PASS only) outside of containment. Operation's Personnel will inspect the above named systems including vent valves, drain valves, relief-valves, sample valves and flushing valves, as well as the in-line valves, piping and pumps. The Operations Department will make this inspection prior to initial fuel load and once between each refueling. Leak rates will be determined and leaks reduced to as low a level as practical. Work requests will be generated by the Operations Department for maintenance/repair/rework to correct leaks as they are found. A one-time-report will be submitted to the NRC prior to initial fuel load.

   In addition, the normal duties and responsibilities of the Operations Department as described in WCGS ADM 02-010 will include walkdown and visual inspection of accessible systems. Identification and correction of leakage is one of the criteria specified for these walkdowns.

Housekeeping is also carried out by a WCGS Administrative Procedure 01-034 which requires a daily walkdown to check for cleanliness, leaks and spills. WCGS Administrative Procedure 01-034, Paragraph 6.1.3 directs that any spills be promptly controlled and cleaned up. WCGS ADM 03-852, Paragraph 6.2 provides the guidelines for radioactive spills.

3. Additional Programs Resulting in Detection and Reduction of Leakage

WCGS has an established Managed Maintenance Program which is documented by WCGS ADM 08-202. This program includes generic preventive maintenance activities based on experience, engineering judgement, inspection, testing and replacement of items which have a specific lifetime such as wear rings, bearings, seals and packing.

WCGS is also committed to ASME Section XI Inservice Inspection Program using the ASME Code 1980 and winter 1981 Addition.