

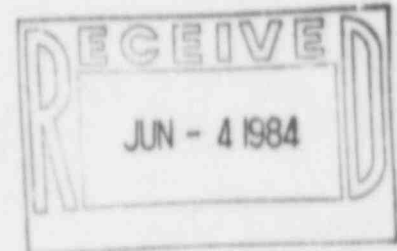


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

June 1, 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 84-084

Re: Docket No. 50-482

Subj: Response to Inspection Report 50-482/84-08

Dear Mr. Johnson:

This letter provides the Kansas Gas and Electric Company (KG&E) response to your letter of May 4, 1984, which transmitted Inspection Report STN 50-482/84-08. As requested, the violations identified in the Inspection Report are being addressed in three parts:

- a) 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 482/8408-01: FAILURE TO PROPERLY REVIEW RECORDS

Finding:

Criterion V of Appendix B to 10 CFR Part 50 requires, in part, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings"

Paragraph 3.14 of Procedure No. QCP-I-05, Revision 17, "Quality Processing of QA Records," states, in part, in regard to the Combined Review Group (CRG), "Documentation received by CRG will be reviewed to ensure compliance to applicable procedures, codes, standards, and specifications"

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Finding (continued):

Contrary to the above, the review by CRG did not ensure compliance to applicable specifications in that a code form (NPP-1) for Spool EJ-04-S016, one of the three spools sampled, identified the piping to be Material Specification SA 312; however, the certified material test reports identified the same piping to be SA 376.

Response:

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

Daniel International Corporation (DIC) has written Nonconformance Report (NCR) 1SN17097P to require a corrected Code Data Report for spool EJ-044-5016 be obtained from the manufacturer. The corrected Code Data report has been obtained and placed in the file.

In the period from August 8, 1983 through September 14, 1983, KG&E Construction Quality Control reviewed 13 of 139 pipe spool document packages. The review was done in accordance with procedure KP11-504 (sampling per MIL std. 105 D). No hardware deficiencies were detected. Although the Code Data Report for spool EJ-04-5016 was incorrect, the specified material was received and used. Therefore the error was administrative and did not affect hardware.

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

The detailed review of the CMTR in question was a "source inspection" responsibility. The Combined Review Group (CRG) verifies that the required CMTRs are received but the accuracy of the information is reviewed by the "source inspectors". The organization responsible for the source inspection will be made aware of the discrepancy identified in this violation and directed to be more alert to administrative errors when reviewing CMTRs.

- c) Date when full compliance will be achieved:

Full compliance will be achieved by June 15, 1984.

June 1, 1984

VIOLATION 482/8408-02: FAILURE TO IDENTIFY NONCONFORMANCES AT TURNOVER

Finding:

Criterion V of Appendix B to 10 CFR Part 50 requires, in part, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings"

Paragraph 3.12 of procedure No. AP-XIV-01, Revision 11, "System Turnover" states, in part, " . . . all open documentation items shall be listed on the Turnover Exception List prior to the system/subsystem turnover"

Contrary to the above, an open documentation item on System Discrepancy List No. EJ-151 for Spool EJ-04-S028 was found that was not listed on the Turnover Exception List prior to turnover.

Response:

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

System Discrepancy List (SDL) No. EJ-151 has been listed on the Turnover Exception List.

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

Daniel International Corporation (DIC) will reinstruct SDL processors to provide SDL's upon origination to the Discipline Construction Completion Engineer for entry on the Turnover Exception List.

- c) Date when full compliance will be achieved:

Reinstruction of SDL processors by DIC will be completed by June 29, 1984.

VIOLATION 482/8408-03: FAILURE TO UPDATE THE SYSTEM DISCREPANCY LIST LOG FOLLOWING CLOSEOUT OF NONCONFORMANCES

Finding:

Criterion V of Appendix B to 10 CFR Part 50 requires, in part,

Finding (continued):

"Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings"

Appendix V of Procedure No. AP-VI-02, Revision 21, "Nonconformance Control and Reporting" states, in part, in regard to system discrepancy lists (SDLs), "After verification of completed resolution(s) for each item delineated on the SDL . . . notify the PQSE of SDI closure in order that the SDL log will be updated accordingly."

Contrary to the above, a review of five SDLs with completed resolution found that the SDL log was not updated accordingly. The SDLs in question are EJ-109, BB-019, BB-061, BB11-007 and BB11-002.

Response:

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

System Discrepancy Lists (SDLs) EJ-109, BB-019, BB-061, BB11-007 and BB11-002 have been entered in the SDL log.

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

Daniel International Corporation (DIC) is revising Construction Procedure AP-VI-02 to give the responsibility for maintaining the SDL log to the Project Quality Engineer (PQE). The procedure revision will require, that after verification of completed resolution(s), the original SDL will be sent to the PQE for entry on the SDL log.

- c) Date when full compliance will be achieved:

Entry of the omitted SDLs on the SDL log has been completed (see paragraph a of this response). Revision of Construction Procedure AP-VI-02 by DIC (see paragraph b of this response) will be completed by July 2, 1984.

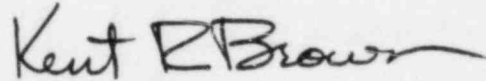
Mr. E.H. Johnson
KMLNRC 84-084

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June 1, 1984

Supporting documentation for the responses provided is available for review at the Wolf Creek job site. If you have any further questions concerning these responses, please contact me or Mr. Otto Maynard of my staff.

Yours very truly,

A handwritten signature in dark ink, appearing to read "Kent E. Brown". The signature is fluid and cursive, with a long horizontal stroke at the end.

for Glenn L. Koester
Vice President - Nuclear

GLK:bb

xc: PO'Connor

HBundy