

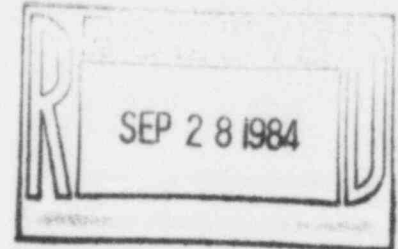


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

September 26, 1984

Mr. D.R. Hunter, Chief
Reactor Project Branch 2
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 84-169
Re: Docket No. STN 50-482
Subj: Response to Notice of Violation 482/84-27

Dear Mr. Hunter:

This letter provides the Kansas Gas and Electric Company (KG&E) response to Mr. Denise's letter of August 28, 1984, which transmitted Notice of Violation 482/84-27. As requested, the violation is 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 482/84-27: FAILURE TO OPERATE PLANT BY PROCEDURE

Finding:

10CFR Part 50, Appendix B, Criterion XI states, in part, "... that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptable limits contained in applicable design documents." Also, Kansas Gas and Electric Company (KG&E) Procedure ADM 02-021, Rev. 2, paragraph 2.1, states, in part, "Any operation or test performed infrequently involving safety-related equipment or systems will be accomplished and documented by the appropriate procedure"

Contrary to the above, while performing "Preoperational Test Procedure Reactor Coolant System (RCS) Hot Preoperational Test,

8504110357 850408
PDR ADOCK 05000482
Q PDR

September 26, 1984

Finding (continued):

SU3-BB05," Rev. 2, dated July 31, 1984, Section 7.1.3 called for heatup to 140-150 degrees Fahrenheit per Procedure GEN 00-001. Procedure GEN 00-001, Mode 5 - Fill and Vent of the RCS, Rev. 0, with attached Procedure Change Forms, Section 4.4, states, "Maintain RCS pressure 110 to 340 psig." This was the second temporary change to the upper pressure limit for the step. The RCS pressure was observed to be as high as 364 psig. and was recorded as such on Data Sheet 8.1.1 of SU3-BB05, "Heatup from ambient to 150 degrees Fahrenheit plateau," of Procedure SU3-BB05. These actions constitute a failure to perform testing in accordance with written test procedures.

Response:

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

The KG&E Operations Group immediately reviewed and initiated the necessary Temporary Changes to station procedures, including GEN 00-001, "Mode 5 - Fill and Vent of Reactor Coolant System", so that they are consistent with the allowable upper administrative Reactor Coolant System pressure limit of 425 psig.

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

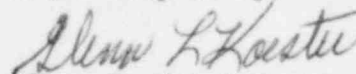
A KG&E Operations Task Force was established to review and evaluate interrelated procedures with the purpose of ensuring that all operating parameters and limits are compatible. As a result of the Task Force's efforts, several procedures were revised, including GEN 00-001 and SU3-BB05.

The requirement for procedure adherence and maintaining plant parameters within the limits specified in procedures was re-emphasized by the Superintendent of Operations to all operations personnel.

- c) Date when full compliance will be achieved:

Full compliance has been achieved.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:bb
xc:PO'Connor
HBundy