

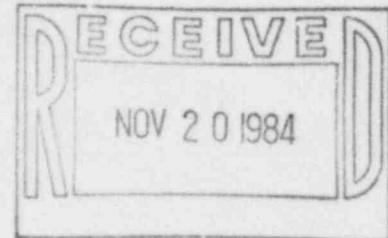


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

November 16, 1984

Mr. R.P. Denise, Director
Wolf Creek Task Force
U.S. Nuclear Regulatory Commission
Region IV
611 Ruan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 84-198

Re: Docket No. STN 50-482

Subj: Response to Inspection Report STN 50-482/84-32

Dear Mr. Denise:

This letter is written in response to your letter of October 19, 1984, which transmitted Inspection Report STN 50-482/84-32. As requested, the violations 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 1: INDOCTRINATION AND TRAINING

Finding:

10CFR50, Appendix B, Criterion II, as implemented by Wolf Creek Quality Assurance Program, FSAR Section 17.2.2, requires that the program provide for indoctrination and training of personnel performing activities affecting quality as necessary to ensure that suitable proficiency is achieved and maintained.

Contrary to the above, QC receipt inspection personnel were unaware that calibrated measuring instruments were available at the instrumentation and calibration shop for accomplishing dimensional inspections.

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Response:

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

Procedure QCP-7.1 "Receipt Inspection" was revised to clarify dimensional verification requirements. In addition, the QC Services Supervisor conducted a training class for all Receipt Inspection personnel which addressed dimensional verification activities related to Receiving Inspection.

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

The actions documented in item a) above will avoid further violations in this area.

- c) Date when full compliance will be achieved.

All corrective actions discussed above have been completed.

VIOLATION 2: PROCUREMENT LEVEL V LIST

Finding:

10CFR50, Appendix B, Criterion V, as implemented by Wolf Creek Plant Quality Assurance Program, FSAR Section 17.2.5, requires that activities effecting quality be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

Contrary to the above, the following examples of inadequate implementation of procedure No. ADM 01--49, Revision 1 ("Procurement Level I and V List")

- a) Critical characteristics of Level V commodities were not always identified completely and correctly.
- b) Written justifications, in certain instances, did not provide an adequate basis for placement of items on the Level V Commodity List.
- c) The receipt inspection requirements did not require verification of critical characteristics.

Response:

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

A KG&E review of all Level V List Items is being conducted to determine the scope of items procured and methods of establishing necessary measures to evaluate the acceptability of existing Level V List Evaluations. Initial corrective actions taken on September 28, 1984 included a revision to procedure No. ADM 01-049: "Procurement Level I and V List" to incorporate additional instructions and requirements to more effectively control the identification of item critical characteristics, provide for adequate written justifications, and establish appropriate receipt inspection criteria including the use of verification testing when deemed necessary. Subsequently, a reevaluation of all Level V List Items is being initiated to reaffirm the acceptability of existing Level V List evaluations, identify any additional criteria and/or controls to be included based on the ADM 01-049 Revision requirements, and consideration of each evaluation for possible 10CFR50.55(e) Reportability in accordance with Company procedures.

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

As stated in a) above, revision to procedures No. ADM 01-049, "Procurement Level I and V List" will provide an adequate basis for determining the acceptability of existing Level V item evaluations and ensure future evaluations contain the criteria necessary to satisfactorily justify procurement as commercial grade (i.e. Level V). Additionally, any Level V items determined not to meet the revised requirements of the revision to procedure No. ADM 01-049 shall be deleted from the Level V List or augmented with additional inspection and/or testing requirements to provide the confidence needed to assure item quality. New procurements proposed as "commercial grade" shall be evaluated in accordance with the revised criteria of procedure No. ADM 01-049.

- c) Date when full compliance will be achieved:

Full compliance will be achieved on January 15, 1985.

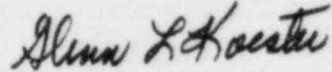
Mr. Denise
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November 16, 1984

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

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

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