



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

May 1, 1985

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

KMLNRC 85-095  
Re: Docket No. STN 50-482  
Subj: FSAR Changes Relating to the Operating  
Quality Program  
Ref: KMLNRC 85-063 dated 2/22/85 from GLKoester,  
KG&E, to HRDenton, NRC

Dear Mr. Denton:

As requested by Mr. Paul O'Connor, NRC Licensing Project Manager for Wolf Creek Generating Station, and Jack Spraul, NRC Quality Assurance Branch, Attachment A contains marked up changed pages to Chapters 3A, 13 and 17 of the Wolf Creek Final Safety Analysis Report (FSAR). These changes incorporate information provided in the Reference and/or provide further clarification on the information previously provided. The attached changes will be incorporated into the first annual update of the Wolf Creek FSAR.

Yours very truly,

*Kent R Brown*

for Glenn L. Koester  
Vice President - Nuclear

GLK:bb  
Attach  
xc:PO'Connor, w/a (2)  
JSpraul, w/a  
JCummins, w/a

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PDR ADOCK 05000482  
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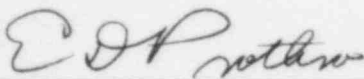
OATH OF AFFIRMATION

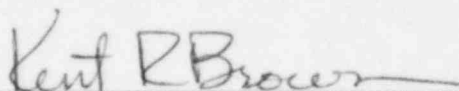
STATE OF KANSAS       )  
                              ) SS:  
COUNTY OF SEDGWICK )

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

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:

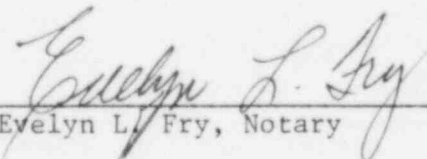
  
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E. D. Prothro, Assistant Secretary

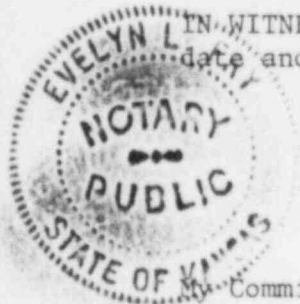
By   
\_\_\_\_\_  
Kent R. Brown  
Group Vice President-Technical Services

STATE OF KANSAS       )  
                              ) SS:  
COUNTY OF SEDGWICK )

BE IT REMEMBERED that on this 1st day of May, 1985, before me, Evelyn L. Fry, a Notary, personally appeared Kent R. Brown, Group Vice President - Technical Services 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



My Commission expires on August 15, 1985.

REGULATORY GUIDE 1.30REVISION 0DATED 8/72

Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment (Safety Guide 30)

## DISCUSSION:

KG&E concurs with major vendor's instruction manuals but does not necessarily apply a signature of approval (ANSI N45.2.4, Section 3(2)).

KG&E uniquely identifies each safety-related item of process control instrumentation. This identification provides Traceability to calibration data. These actions are KG&E's alternative to the tagging or labeling of items to indicate the calibration date and the identity of the persons who performed the calibration (ANSI N45.2.4, Section 6.2.1).

At WCGS, the adequacy of protective measures for items in storage is verified by warehouse, Quality Control and Quality Assurance personnel on an audit/surveillance basis (ANSI N45.2.4, Section 3.3).

INSERT  
1 →

REGULATORY GUIDE 1.33REVISION 2DATED 2/78

Quality Assurance Program Requirements (Operation)

## DISCUSSION:

The recommendations of this guide and the ANSI Standards listed in Table 17.2-3 are met except where specific alternatives are indicated. The provision to automatically incorporate the latest issued ANSI standards as set out in the last paragraph of ANSI N18.7 is not adopted.

REGULATORY GUIDE 1.37REVISION 0DATED 3/73

Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants

## DISCUSSION:

KG&E complies with the recommendations of this regulatory guide.

REGULATORY GUIDE 1.38REVISION 2DATED 5/77

Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of items for Water-Cooled Nuclear Power Plants

SNUPPS-WC

REGULATORY GUIDE 1.111

REVISION 1

DATED 7/77

Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors

DISCUSSION:

The recommendations of this regulatory guide are met. Refer to Section 2.3.

REGULATORY GUIDE 1.113

REVISION 1

DATED 4/77

Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I

DISCUSSION:

The recommendations of this regulatory guide are met. Refer to Section 11.2.

REGULATORY GUIDE 1.114

REVISION 1

DATED 11/76

Guidance on Being Operator at the Controls of a Nuclear Power Plant

DISCUSSION:

The recommendations of this regulatory guide are met. Refer to Section 13.1.

REGULATORY GUIDE 1.116

REVISION O-R

DATED 5/77

Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems

DISCUSSION:

KG&E complies with the recommendations of this regulatory guide with the clarification that at WCGS the adequacy of protective measures for items in storage is verified by Warehouse, Quality Control and Quality Assurance personnel on an audit/surveillance basis (ANSI N45.2.8, Section 3.4.1).

INSERT →

1

REGULATORY GUIDE 1.123

REVISION 1

DATED 7/77

Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants

DISCUSSION:

KG&E complies with the recommendations of this regulatory guide.

## 13.1.1.2.3 Director Nuclear Operations

The Director Nuclear Operations reports to the Vice President - Nuclear for overall program direction. He is responsible for the Operations, Project Planning and Controls and Training departments. The Plant Manager, the Manager Operations Support, the Supervisor Project Planning and Controls and the Manager Nuclear Training report to the Director Nuclear Operations for overall program direction.

## 13.1.1.2.3.1 Plant Manager

The Plant Manager <sup>has the prime responsibility</sup> reports to the Director Nuclear Operations. He ~~is responsible~~ for the safe operation of WCGS and ~~controls plant activities through his staff, as described in this section. Under his direction, the plant staff develops detailed procedures and instructions for testing and operation of the station. In addition the Startup Manager reports to the Plant Manager.~~ <sup>plant and outages activities.</sup>

## 13.1.1.2.3.1.1 Startup Manager

The Startup Manager reports to the Plant Manager for overall program direction and to the Wolf Creek Site Director for day-to-day project direction. He is responsible for the overall direction and administration of the functions and activities required to conduct the WCGS Startup program. Chapter 14.0 presents a description of the Startup Organization and delineates the Startup Manager's responsibilities. When the Startup program has concluded, the Startup Organization will be dissolved.

## 13.1.1.2.3.2 Manager Operations Support

The Manager Operations Support reports to the Director Nuclear Operations and is responsible for providing staff support to the Director Nuclear Operations. The Manager Operations Support supervises the activities of the Operations Support Group. He reviews nuclear operational activities and coordinates home office support to plant operations.

## 13.1.1.2.3.3 Manager Nuclear Training

The Manager Nuclear Training reports to the Director Nuclear Operations and is responsible for the overall training activities of the Nuclear Department. He is responsible for insuring training staff qualifications, including reviewing instructor evaluation records with the Training Supervisor and Simulator Supervisor. He is responsible for reviewing the content of training programs for technical completeness

#### 13.1.1.2.7 Manager Quality First

The Manager Quality First reports directly to the Group Vice President - Technical Services. He is responsible for directing the Quality First Program which ~~provides an independent organization to investigate safety and quality concerns.~~

#### 13.1.1.2.8 Manager Construction

The Manager Construction reports directly to the Group Vice President - Nuclear. He provides construction support to the project, utilizing KGE plant modification and maintenance procedures.

establishes the necessary administrative and investigative measures to ensure that all quality concerns related to safe plant operations, quality of work and compliance with project requirements are appropriately evaluated, investigated, dispositioned, verified and documented.



## SNUPPS-WC

### 17.2.1.4.4 Quality Branch Personnel Independence

The authorities and duties of QA and QC personnel and other organizations performing quality verification functions are clearly established in written procedures. Such persons have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify corrective action. Assurance of quality by auditing, inspecting, checking, or otherwise verifying program activities is by personnel independent of the individual or group performing the specific activity.

### 17.2.1.5 Manager Nuclear Plant Engineering

The Manager Nuclear Plant Engineering reports to the Director of Engineering and Technical Services for overall program direction. He is responsible for station modifications, additions, engineering studies, and design reviews which are conducted at the general office or subcontracted by the general office to an outside organization.

### 17.2.1.6 Manager Nuclear Services

The Manager Nuclear Services reports to the Director of Engineering and Technical Services for overall program direction. He is responsible for providing services in the areas of licensing, fuels management, fuel procurement, and safety analysis. He is responsible for home office support of the plant in nuclear engineering, chemistry, health physics, and environmental areas.

### 17.2.1.7 Director Nuclear Operations

The Director Nuclear Operations reports to the Vice President-Nuclear for overall program direction. He is responsible for the operations, training and startup departments. The Plant Manager, the Manager Operations Support, Supervisor Project Planning and Controls, and the Manager Nuclear Training report to the Director Nuclear Operations for overall program direction. The Director Nuclear Operations is also responsible for preparing those portions of the WCGS operating and maintenance budget not specifically assigned to other divisions.

#### 17.2.1.7.1 Plant Manager

The Plant Manager reports to the Director Nuclear Operations. He ~~is responsible~~ *has the prime responsibility*

## SNUPPS-WC

*plant and outage activities*

for the safe operation of ~~the~~ WCGS. He controls plant activities through Superintendents as discussed in Section 13.1. He has the prime responsibility for safe operation of the plant. The plant staff, under the direction of the Plant Manager, develops detailed procedures and instructions for testing and operation of the station.

### 17.2.1.7.2 Startup Manager

The Startup Manager reports to the Plant Manager for overall program direction and to the Wolf Creek Site Director for day-to-day project direction. He is responsible for the overall direction and administration of the functions and activities required to conduct the WCGS startup program. Chapter 14.0 presents a description of the Startup Organization and delineates the Startup Manager's responsibilities. When the startup program has concluded, the Startup Organization will be dissolved.

### 17.2.1.7.3 Manager Nuclear Training

The Manager Nuclear Training will report to the Director Nuclear Operations. He is responsible for insuring training staff qualifications, including reviewing instructor evaluation records with the Training Supervisor and Simulator Supervisor. He is responsible for reviewing the content of training programs for technical completeness and compliance with regulatory standards. He is also responsible for auditing the quality of on-site training programs. The Manager Nuclear Training is also responsible for training programs for Corporate office personnel involved in support of WCGS during normal operations, preparedness for response to off-normal incidents, and long-term recovery programs.

### 17.2.1.7.4 Manager Operations Support

The Manager Operations Support reports to the Director Nuclear Operations and is responsible for providing staff support to the Director Nuclear Operations. The Manager Operations Support supervises the activities of the Operations Support Group. He reviews nuclear operational activities and coordinates home office support to plant operations.



17.2.1.11 Manager Quality First

The Manager Quality First reports directly to the Group Vice President-Technical Services. He is responsible for directing the Quality First Program which ~~provides an independent organization to investigate safety and quality concerns.~~

17.2.1.12 Manager Construction

The Manager Construction reports directly to the ~~Group Vice President - Nuclear.~~ He provides Construction Support to the project, utilizing K&E plant modification and maintenance procedures. Outside contractors may also be used to perform safety-related construction work under an approved quality assurance program.

establishes the necessary administrative and investigative measures to ensure that all quality concerns related to safe plant operation, quality of work and compliance with project requirements are appropriately evaluated, investigated, dispositioned, verified and documented.

#### 17.2.2.6 Operating Quality Program Verification of Implementation

Achievement of the requirements of the operating Quality program shall be verified through independent and integral control activities. The Quality Branch under the Director Quality shall audit general office internal and interfacing quality activities and shall conduct audits and surveillance of the operating plant. These audits shall assure overall implementation verification of the operating Quality program. Quality Branch personnel will perform audit, surveillance and inspection of quality activities performed by the operating organization, consultants, suppliers, and other KG&E personnel. *In addition an annual independent assessment of the effectiveness of the operating Quality program shall be made under the direction of the Vice President - Nuclear.*

#### 17.2.2.7 Personnel Training and Qualification

General indoctrination and training programs shall be provided for the general office and plant site personnel to assure that they are knowledgeable regarding quality procedures and requirements. The requirements for training of WCGS personnel are described in Section 13.2. The training of plant operating personnel is the responsibility of the plant Training Supervisor. Records of training shall be maintained to demonstrate compliance with the qualification requirements of 10 CFR 55 and ANSI N18.1/ANS-3.1, "Selection and Training of Nuclear Power Plant Personnel". KG&E personnel performing complex, unusual, or potentially hazardous work shall be instructed in special indoctrination or briefing sessions. Emphasis shall be on special requirements for safety of personnel, radiation control and protection, unique features of equipment and systems, operating constraints, and control requirements in effect during performance of work. Where required by codes and standards, personnel are trained or qualified according to written procedures in the principles and techniques of performing specific activities described in sections 17.2.9, 17.2.10, and 17.2.11 of this chapter.

Training will be conducted in a time frame adequate to allow personnel to prepare for their job responsibilities. Retraining will be scheduled as necessary to assure adequate skills are maintained. KG&E personnel assigned to perform specialized work tasks or to augment the plant staff for major modifications and contractor personnel performing work onsite shall receive indoctrination in the following subjects as required prior to commencing work:

1. Safety rules
2. Health-physics control and monitoring of radiation exposure

## SNUPPS-WC

### 17.2.15 NONCONFORMING MATERIAL, PARTS, OR COMPONENTS

#### 17.2.15.1 Scope

Nonconformances are any deficiency in characteristics, documentation, or procedure which renders the quality of an item unacceptable or indeterminate. Nonconformances, therefore, include material deficiencies, malfunctioning or inoperative structures, systems and components, and departures from specified procedural requirements which impact the quality of an item. Nonconforming activities which have not resulted in hardware nonconformances (i.e., programmatic or procedural deficiencies which do not impact the quality of an item), are corrected in accordance with Chapter 17.2.16, Corrective Action.

#### 17.2.15.2 Nonconformance Controls

Nonconformances identified under the KG&E Quality Program shall be identified, documented, controlled, dispositioned and corrected in accordance with approved procedures. These measures shall provide for the notification of affected parties and controls to prevent the inadvertent use of nonconforming items.

Nonconformances shall be controlled by report documentation, tagging, marking, logging, or physical segregation. Nonconformances shall be documented on records which identify the nonconforming condition, record the disposition, and register the signature of an appropriate approval authority. Nonconformances shall be reworked, rejected, repaired, or accepted. Repaired and reworked items shall be reinspected */ tested* in accordance with applicable procedures. Reinspection results and operational data, gathered subsequent to repair or rework, are documented or referenced on nonconformance, test or inspection documentation.

Measures shall be established to control the conditional release of nonconformances for which correction is pending and a technical evaluation indicates that installation and/or testing, will not adversely affect nor preclude identification and correction of the nonconformance. A conditional release to proceed installation and/or with testing of a system or subsystem with outstanding nonconformances will consider the nature of the nonconformance, its effect on installation and/or testing and the need for supplemental tests or inspections after correction of the nonconformance. Conditional release evaluations shall be documented.

*Safety-related and special scope conditional releases are reviewed and approved by the KG&E Quality Branch prior to implementation.*  
Nonconforming items required for Technical Specification Operability shall only be released for use through the completion of a Plant Modification Request (PMR) and, thus, cannot be conditionally released for operations.

## INSERTS

### Insert 1

KG&E warehouse personnel are responsible for tracking and implementation of the warehouse storage/maintenance program. Additionally, warehouse personnel perform regular inspections of storage areas for cleanliness and orderliness.

KG&E Quality Control personnel perform inspections of maintenance activities as prescribed in approved procedures. Additionally, Quality Control personnel perform periodic surveillance inspections of storage areas for compliance to applicable requirements.

KG&E Quality Assurance personnel perform periodic audits and surveillances of warehouse storage/maintenance activities to assure compliance to applicable requirements.

### Insert 2

to ensure that critical attributes possibly affected by the nonconforming condition remain acceptable. These procedures will be based on original inspection and test requirements or approved alternatives.

### Insert 3

Plant Modification Requests(PMRs) are used in the Nonconformance Program to carry out dispositions of "use-as-is" or "repair." The PMR process ensures that all aspects of plant operation are considered in light of the fact that the dispositioned item is now not exactly per original design. These considerations include revision of applicable drawings, possible revisions to operation, test, maintenance and inspection procedures; training of affected personnel, changes to spare parts inventory; unreviewed safety questions; and review of licensing documents.