

MAY 08 1985

Dockets: STN 50-482/84-57
STN 50-482/85-11
EA 85-27

Kansas Gas and Electric Company
ATTN: Glenn L. Koester
Vice President - Nuclear
P. O. Box 208
Wichita, Kansas 67201

Gentlemen:

This refers to the routine inspections of activities authorized by NRC Construction Permit No. CPPR-147 conducted by Mr. W. G. Guldemon and other members of the Wolf Creek Task Force including Messrs. M. Farber and D. Williams of the Region III office. These two inspections were conducted under the preoperational test inspection program during the periods of October 1 - December 20, 1984 and February 1 - 28, 1985 at the Wolf Creek Generating Station. The results of these inspections were discussed with you and members of your staff at an Enforcement Conference held at the Wolf Creek site on December 4, 1984, which was attended by Mr. R. P. Denise and other members of the NRC staff, and with Mr. C. Mason and other members of your staff at an Exit Meeting on February 28, 1985.

During these inspections, violations of NRC requirements were identified. These violations indicated weaknesses in your preoperational test program. Violation IA in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty involves three examples which your test program failed to provide verification of design safety features. Violation IB involves two examples in which your test program failed to demonstrate component performance during limiting accident conditions under which the component is expected to operate. Violation IC involves three examples in which your test program failed to ensure the use of proper testing methods and proper equipment. Violation ID involves one example in which your test program failed to verify a design document commitment.

Previous Inspection Reports identified similar weaknesses (Inspection Reports 50-482/84-15, 50-482/84-20, and 50-482-84-30). Failures to properly execute procedures and to properly document test discrepancies had been identified previously. In addition, during previous inspections we found a number of completed preoperational test packages that were voided during the final review stages due to administrative errors. These violations and other concerns involving your failure to provide adequate acceptance criteria and to adequately evaluate anomolous test results were discussed with you previously. Since similar violations were identified subsequently, it appears that your initial actions were to resolve these weaknesses on a case-by-case basis rather than in a comprehensive manner. Insufficient management attention was devoted to identifying and correcting the root causes of these problems. As a result, as documented in NRC Inspection

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

8505290054 850508
PDR ADOCK 05000482
Q PDR

TEO1
11

Report 50-482/84-57, these violations and concerns indicated that a breakdown in the execution of your preoperational test program occurred.

To emphasize the importance the NRC places on the execution of your preoperational test program to ensure that the program demonstrates the functional capabilities of structures, systems, and components, and after consultation with the Director, Office of Inspection and Enforcement, I have been authorized to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Twenty-Five Thousand Dollars (\$25,000). This violation has been categorized as a Severity Level III violation in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985).

The base value for this type of violation is \$50,000. However, the Enforcement Policy permits the consideration of factors for mitigation or escalation of the proposed penalty. The staff reviewed these factors and determined that mitigation of the base penalty by 50% was warranted. While we recognize that your initial actions were limited in scope, we also recognize that you have taken the prompt and extensive corrective actions you described during the Enforcement Conference on December 4, 1984 and in your letters of December 11, 1984 and February 5, 1985. These corrective actions have been reviewed and found to be satisfactory (as documented in paragraph 2 of enclosed Inspection Report 50-482/85-11).

Three other violations identified in Inspection Report 50-482/85-11 and discussed in the enclosed Notice are not assessed a civil penalty. Violation IIA involves three failures to follow plant administrative procedures. Violation IIB involves a failure to follow a preoperational test procedure, and Violation IIC involves a failure to operate the plant to procedural requirements. These violations are categorized as Severity Level V violations.

You are required to respond to the violations and should follow the instructions in the Notice when preparing your response. Your response to the enclosed Notice should address these items and provide an updated status on completion of those items described in your December 11, 1984 letter. Your response should also address specifically the corrective actions which you discussed with the Region IV staff and which you have implemented to preclude recurrence of this type of violation during the power ascension and operation phases at Wolf Creek. You may reference previous correspondence concerning these violations.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Kansas Gas and Electric Company

-3-

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By
Paul S. Check

Robert D. Martin
Regional Administrator

Enclosures:

1. Notice of Violation and Proposed
Imposition of Civil Penalty
2. Appendix A - NRC Inspection Report
50-482/84-57
3. Appendix B - NRC Inspection Report
50-482/85-11

cc:

Kansas Gas and Electric Company
ATTN: Gene P. Rathbun, Manager
of Licensing
P. O. Box 208
Wichita, Kansas 67201

Forrest Rhodes, Plant Superintendent
Wolf Creek Generating Station
P. O. Box 309
Burlington, Kansas 66839

Kansas Radiation Control Program Director

bcc to DMB (IE01)

bcc distrib. by RIV:

*RPB2	Myron Karman, ELD, MNBB (1)
*Resident Inspector	R. D. Martin, RA
*Section Chief (RPB2/A)	R. P. Denise,
*EP&RPB	J. Harrison, RIII
*RIV File	*MIS System
*RSTS Operator	*D. Weiss, LFMB (AR-2015)
T. Westerman	
*w/766	

1/E01

Notice of Violation

-6-

Kansas Gas and Electric Company

Distribution

PDR
LPDR
SECY
ACRS
CA
JTaylor, IE
RVollmer, IE
RMartin, RIV
JAxelrad, IE
JCollins, IE
BBeach, IE
JLieberman, ELD
VStello, DED/ROGR
FIngram, PA
BHayes, OI
SConnelly, OIA
JCrooks, AEOD
HDenton, NRR
Enforcement Coordinators
RI, RII, RIII, RIV, RV
EJordan, IE
BGrimes, IE
JPartlow, IE
BSummers, IE(letterhead)
ES File
EA File
EDO RDG File
DCS

IE:ES	ELD	RIV	ES:D	IE:DD	IE:D
BBeach	JLieberman	RMartin	JAxelrad	RVollmer	JTaylor
4/ /85	/ /85	/ /85	/ /85	/ /85	/ /85

RIV-RPB2/
LEMartin
4/26/85

DRSP
RPDenise
4/27/85

RC
WBrown
4/29/85

EO
TFWesterman
4/29/85

RA
JDMartin
4/29/85

-9-

Distribution

LPDR

SECY

ACRS

CA

JTaylor, IE

RVollmer, IE

RMartin, RIV

JAxelrad, IE

JCollins, IE

BBeach, IE

JLieberman, ELD

VStello, DED/ROGR

FIngram, PA

8Hayes, 01

SConnelly, OIA

JCrooks, AEOD

HDenton, NRR

Enforcement Coordinators

RI, RII, RIII, RIV, RV

EJordan, IE

BGrimes, IE

JPartlow, IE

BSummers, IE(letterhead)

ES File

EA File

EDO RDG File

DCS

IE:ESMA
BBeach
4/26/85

ELDS. Bruno
JLieberman
4/26/85

RIVIN ~~at~~
RMartin
4/29/85

ESD
JAXEtrad
4/20/85

IE: [redacted]
Ryeimer
5/2/85

IE. 1
J Taylor
5/2/85

5/10/5/1