

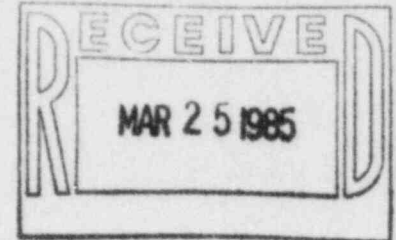


KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER
VICE PRESIDENT - NUCLEAR

March 19, 1985

Mr. R.D. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 85-078

Re: Docket No. STN 50-482

Ref: Letter dated 2/19/85 from RDMartin, NRC, to
GLKoester, KG&E, SALP Report 482/84-36

Subj: Response to SALP Report

Dear Mr. Martin:

The Referenced letter forwarded the NRC's Systematic Assessment of Licensee Performance (SALP) Board Report of the Wolf Creek Generating Station. As requested by the Reference, this letter provides comments on the report and addresses Kansas Gas and Electric Company's (KG&E) actions taken in two functional areas.

The SALP Report covered the period from August 1, 1983 through September 30, 1984. Section V.F of the Report lists an escalated enforcement action concerning "Failure to implement QA Procedures involving the turnover from construction of the Refueling Water System - NRC Report 482/84-02". This violation was issued on March 23, 1983 and the order imposing a civil penalty was dated June 30, 1983. This matter was addressed in the previous year's SALP Report and was not" . . . initiated by NRC Region IV during this assessment period." In addition, the reference to Inspection Report 50-482/84-02 is incorrect.

KG&E has reviewed the SALP Report and either has or will give appropriate consideration to all of the recommended licensee actions. Attachment 1 to this letter specifically addresses the actions taken in the area of construction quality assurance. Similarly, Attachment 2 addresses emergency preparedness.

KG&E welcomes independent assessments at Wolf Creek and is striving to attain additional improvements in performance that should be evident during the next SALP Board review.

8505290340 850522
PDR ADOCK 05000482
G PDR

Yours very truly,

Glenn L Koester

GLK:bb

Attach

xc:PO'Connor (2), w/a

JCummins, w/a

1E40

Attachment 1

SALP Report Response - Construction Quality Assurance

The SALP Board recommended a review of all nonconformance and corrective action reports to assure that they have not been used as a vehicle to obviate drawing or specification requirements, and/or commitments to the NRC.

Construction Nonconformance Reports (NCRs) are reviewed in accordance with approved procedures by the KG&E Quality Assurance (QA) organization. These reviews are independent of the KG&E and Daniel International Corporation (DIC) Construction organizations and the results are provided to the KG&E Manager QA (WCGS). This process has not discovered any cases where the NCRs have been used as a means to circumvent requirements and/or commitments to the NRC.

Corrective Action Reports (CARs) were reviewed to assure that there were no programmatic deficiencies. This review was performed coincident with the corrective actions performed in KG&E CAR Number 19 (Reference KMLNRC 84-238, KG&E CAR #19, Management Action Plan, Section VI.H, Item D, Page 8). Although not originally the scope of KG&E CAR #19, non-welding related quality programs were reviewed for comparable programmatic deficiencies. In accomplishing this, KG&E and DIC conducted an extensive program assessment of the piping, hanger, mechanical, electrical, and civil disciplines to ascertain the adequacy of the construction and quality programs instituted. This assessment determined that a satisfactory level of confidence exists to assure compliance with the Design and Construction Quality Assurance Program, ANSI N45.2, and design and procedural requirements. A review of DIC and KG&E CARs was performed to determine if any QA problems existed similar to those noted in KG&E CAR #19. Aside from CAR #19 and the related DIC CARs, there were no CARs that had significant problems pertaining to the construction inspection and document areas.

Attachment 2

SALP Report Response - Emergency Preparedness

Significant progress has been made in emergency preparedness program implementation since the September 17-28, 1984 NRC inspection. This has been demonstrated to the NRC during a field exercise conducted on November 7, 1984 and during an NRC appraisal inspection conducted January 7-11, 1985. KG&E letters, KMLNRC 85-008 dated January 4, 1985 and KMLNRC 85-043 dated January 30, 1985, provided detailed status and schedule information that responded to the September 1984 NRC inspection.

An updated schedule has been developed identifying key elements of the 1985 KG&E Emergency Preparedness Program. The progress schedule will be distributed to cognizant middle and upper KG&E management. Emergency Preparedness Program status will be discussed during KG&E management staff meetings to address program commitments which impact other KG&E departments.

The SALP Board reported a number of specific areas, within the functional area of emergency preparedness, that had not been completed. Actions taken in these areas are addressed below.

Personnel Assignments and Training

The KG&E Emergency Response Organization (ERO) was finalized as of January, 1985. A document identifying KG&E personnel with ERO assignments was issued by the Emergency Planning Coordinator January 16, 1985. Training for primary and first alternate position holders was completed on January 15, 1985.

The existing KG&E ERO is currently being evaluated and updated to reflect new assignments, personnel transfers, and response position changes. The revised ERO will be finalized and issued in March 1985.

Preliminary planning for conducting continued ERO training is in progress. A training program schedule will be developed and implemented to complete retraining of primary and first alternates and initial training of the remainder of the ERO. Training and retraining of primary and first alternates is expected to be complete in May 1985. Initial training of the remainder of the ERO is expected to be complete by November, 1985.

Attachment 2

Prompt Public Notification System

Procedures describing tone alert radio distribution and siren maintenance have been developed and approved. Sirens are installed and operational; formal, documented testing will proceed following fuel load. Initial tone alert radio distribution is complete and maintenance of the distribution is in progress.

News Media Training

News media training was performed on October 24, 1984. News media training for 1985 is scheduled in October.

Emergency Personnel Call-Out Procedures

Emergency call-out procedures were completed in January, 1985. Training on the existing procedures was also completed in January. The call-out procedure series is currently undergoing review and revision. The changes are based on ERO position and staffing changes, additional information available on the Automatic Dialing System (ADS) and improvements identified in the manual call-out methodology. A manual call-out drill will be scheduled after fuel load, but prior to exceeding 5% power.

Middle Management Awareness of Emergency Preparedness Program Requirements

A preliminary, 1985 KG&E Emergency Preparedness Program schedule has been developed. The schedule indicates key program milestones and commitments. The schedule will be distributed to the appropriate KG&E managers for their information. Monthly progress status reports are developed by the Emergency Planning Coordinator and distributed to the appropriate KG&E managers. Additionally, Emergency Preparedness Program issues have been, and will continue to be, discussed during KG&E management staff meetings.