



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

May 30, 1985

Mr. J.M. Taylor, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

KMLNRC 85-143

Re: Docket No. STN 50-482

Ref: 1) Letter dated 5/8/85
from RDMartin, NRC, to GLKoester, KG&E
2) KMLNRC 85-142 dated 5/30/85
from GLKoester, KG&E, to JMTaylor, NRC

Subj: Enforcement Action 85-27

Dear Mr. Taylor:

Enclosed is Kansas Gas and Electric Company's (KG&E) response to Violation II.C (Violation Not Assessed a Civil Penalty) as documented in Reference 1. Pursuant to 10CFR2.201, the following five items are addressed for the alleged violation:

1. Admission or denial of the alleged violation;
2. The reason for the violation, if admitted;
3. The corrective steps that have been taken and the results achieved;
4. The corrective steps that will be taken to avoid further violations; and
5. The date when full compliance will be achieved.

KG&E's response to Item I (Violation IA, IB, IC, and ID) of Enforcement Action 85-27 was transmitted by Reference 2.

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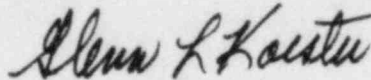
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Please contact me or Mr. Otto Maynard of my staff, if you have any questions concerning KG&E's response to the alleged violation.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:dab

Enclosure

xc: PO'Connor (2)
JCummins
RDMartin

STATE OF KANSAS)
) SS
CITY OF WICHITA)

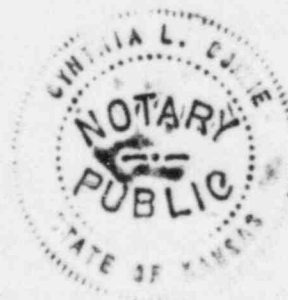
Glenn L. Koester, of lawful age, being first duly sworn upon oath says that he is Vice President - Nuclear and an Officer of Kansas Gas and Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed that same for and on behalf of said Company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Glenn L. Koester
Glenn L. Koester
Vice President - Nuclear

SUBSCRIBED and sworn to before me this 30 day of May, 1985.

Cynthia J. Ramm
Notary Public

Expiration Date 11/15/87



Violations Not Assessed a Civil Penalty

Finding

- C. 10CFR Part 50, Appendix B, Criterion XI requires 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.

KG&E Administrative Procedure ADM 02-101, Revision 11, "Temporary Modifications", in paragraph 3.1.6 requires that if the procedure authorizing the installation of a modification is suspended for a period of greater than 24 hours, the modification must be restored to normal or tagged in accordance with this procedure.

Contrary to the above, at the time of this inspection, test flanges rather than the required blind flanges to Flow Elements EM-924, EM-925, EM-926, and EM-927 were installed downstream of certain safety injection valves and the test flanges were not tagged as a temporary modification in accordance with ADM 02-101.

Response

1. Admission or denial of alleged violation:

The test flanges had been installed in accordance with surveillance test procedure STS CV-216, "Boron Injection Flow Path Check Valve Test". Following completion of the surveillance procedure, the removal of the test flanges, and reinstallation of the permanent blind flanges, was tracked by a Work Request rather than a temporary modification as required by administrative procedure ADM 02-101, "Temporary Modifications".

2. The reason for the violation, if admitted:

The implementation requirements of the Temporary Modification procedure were not clear and therefore, resulted in the described procedural deviation.

3. The corrective steps that have been taken and the results achieved:

The tracking Work Request has been completed and the permanent blind flanges have been reinstalled. The Plant Manager has issued a letter to all Section Superintendents involved in test procedure implementation reiterating the requirements of administrative procedure ADM 02-101, "Temporary Modifications", and instructing each Superintendent to review these requirements and discuss them with the affected personnel.

4. The corrective steps that will be taken to avoid future violations:

In addition to the action described above, a modification to administrative procedure ADM 02-101 is being prepared to clarify the implementation requirements.

5. The date when full compliance will be achieved:

Full compliance will be achieved by June 15, 1985.