

Kan-Wolf Creek

STATE OF KANSAS

---

OFFICE OF THE GOVERNOR

State Capitol  
Topeka 66612-1590

John Carlin Governor

March 5, 1985

The Honorable Nunzio Palladino  
Chairman  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Palladino:

During the past few months, you have received letters of concern from various sources regarding questions which exist relating to the Wolf Creek Generating Station. Enclosed are copies of such letters, which include the following:

- 1) November 5, 1984 letter to Darrell Eisenhut, Director of Reactor Licensing, from the Kansas Corporation Commission;
- 2) February 1, 1985 letter to you from Congressman Glickman;
- 3) February 8, 1985 letter to you from Congressman Slattery;
- 4) February 14, 1985 and February 18, 1985 letters to you from over one hundred of our Kansas legislators.

I am writing you to underscore the need for a full and complete examination of all matters which relate to the plant's safety, since such questions obviously impact directly upon our public welfare. As previously requested, I urge you to make your findings available to my office, our Attorney General, our Congressional delegation and to the Kansas Corporation Commission.

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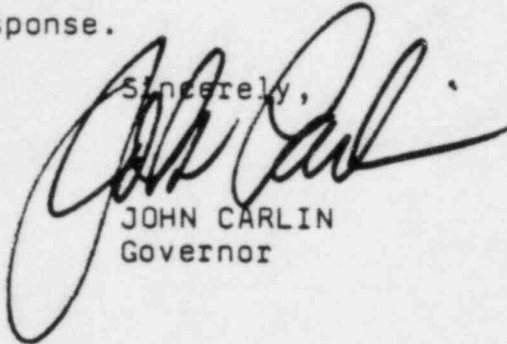
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Chairman Palladino  
March 5, 1985  
Page Two

I am confident that you appreciate the right of all Kansas citizens to be assured of the safe construction and operation of Wolf Creek.

I look forward to your response.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Carlin", written over the word "Sincerely,".

JOHN CARLIN  
Governor

JC:jj

Enclosures (4)

TAB B

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John Carlin Governor

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3/7....To EDO to Prepare Response for Signature of Chairman and  
Comm Review...Date due Comm: Mar 19...Cpys to: RF..85-186

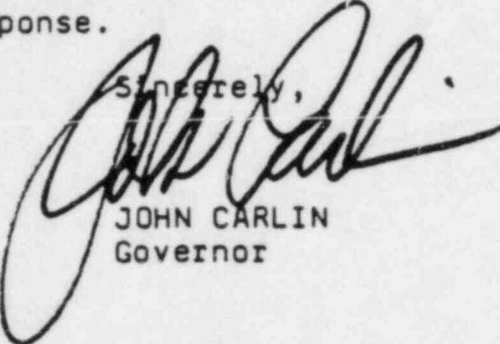
(If response will be delayed for more than 10 working days, please ack in writing or by phone)

Chairman Palladino  
March 5, 1985  
Page Two

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JOHN CARLIN  
Governor

JC:jj

Enclosures (4)



TOPEKA

HOUSE OF  
REPRESENTATIVES

February 14, 1985

The Honorable Nunzio Palladino  
Chairman  
Nuclear Regulatory Commission  
Washington, D.C. 20545

Dear Mr. Chairman:

We, the undersigned, members of the Kansas Senate and House of Representatives, are deeply concerned with the approaching conditional licensure of the Wolf Creek electrical generating station. It is our understanding that this licensure may occur in spite of the fact that open investigations exist into matters such as alleged construction defects and quality assurance deficiencies. Since such matters are directly relevant to the issue of plant safety, we ask for your assistance.

Correspondence between your office and the offices of Congressman Dan Glickman and Congressman John D. Dingell has been made available for our review. It is clear from our review of the Congressmen's questions and your response that:

- 1) A substantial number of structural steel welds have been found to be below accepted standards;
- 2) Investigations into the weld deficiencies are underway, including such issues as missing, falsified or erroneous quality assurance records; and
- 3) Unanswered safety questions remain, including problems relating to the safe separation of electrical cables.

We have, for several years, expressed our concerns and our citizen's concerns relating to the safe and economical production of nuclear-generated electricity. The Wolf Creek project has been the object of scrutiny from this Legislature and from other agencies of state government. We have attempted to maximize the ability of our utility commission to review the project and determine the extent to which the ratepayers will assume construction related costs.

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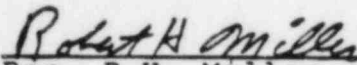
However, Congress has established that your commission is the review mechanism for all matters relating to the safe construction and operation of nuclear plants. It is in that capacity that we seek your assistance.

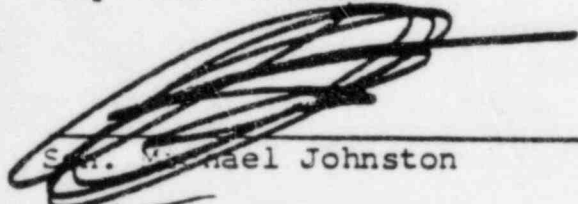
We ask that all investigations, including any pre-investigation matters pending in the Office of Investigation and of Inspection and Enforcement, be concluded in a comprehensive and thorough manner. We ask that your findings be made available to us, to the Kansas Congressional delegation, our Governor and Attorney General, and to the Kansas Corporation Commission. We ask that these things be done prior to the issuance of a conditional, low-power operating license.

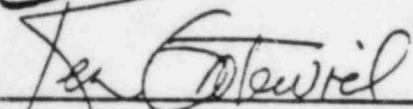
When the power is turned on at Wolf Creek, it is essential that all questions have been answered and all safety standards met. Only these conditions will provide the needed assurances to Kansas to validate the operational integrity of the Wolf Creek plant.


We ask for your prompt response, and express our appreciation for your consideration of this matter.

Sincerely,

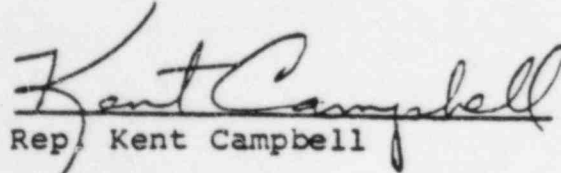
  
Rep. R.H. Miller


  
Sen. Michael Johnston

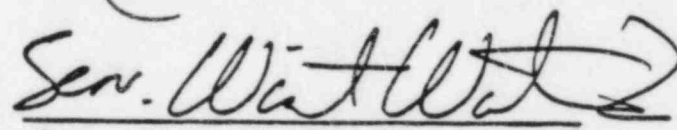
  
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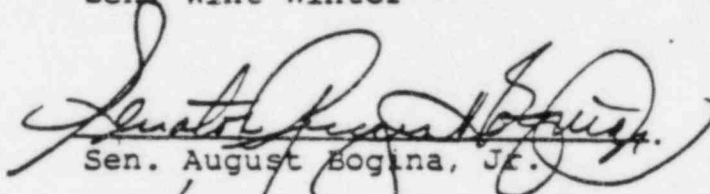
  
Rep. Richard Schmidt

  
Rep. H.G. Dillon

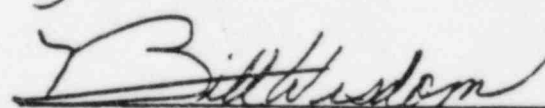
  
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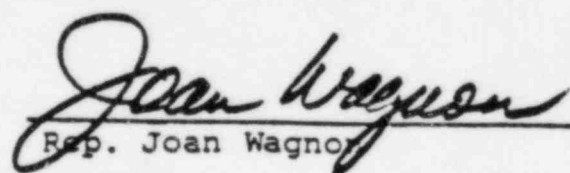
  
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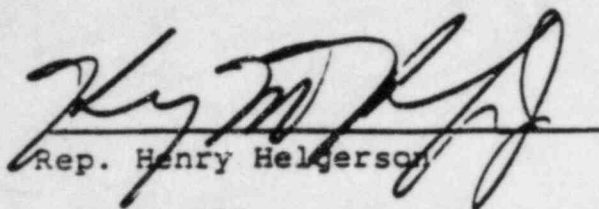
  
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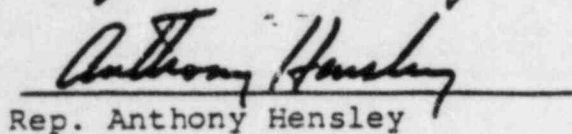
  
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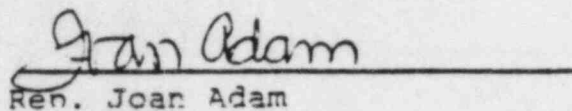
  
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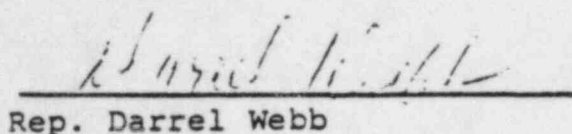
  
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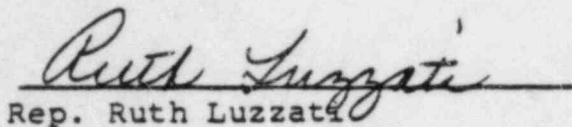
  
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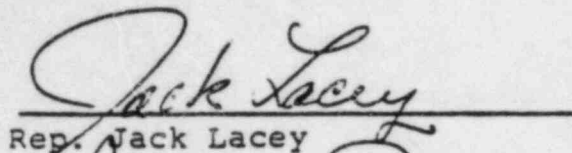
  
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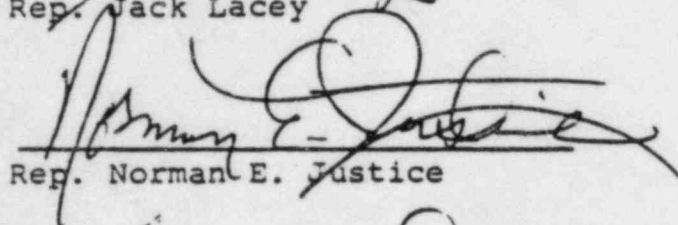
  
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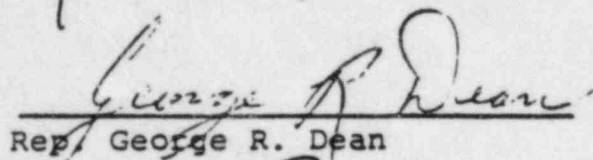
  
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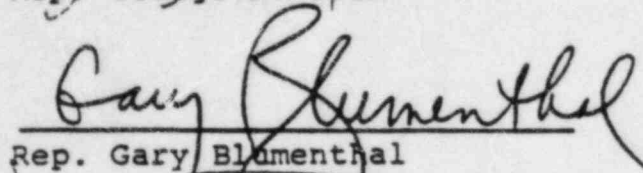
  
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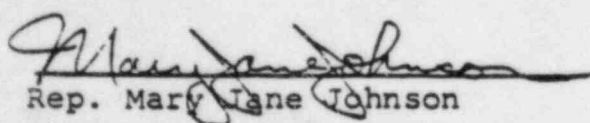
  
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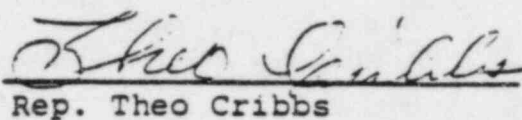
  
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Rep. George R. Dean

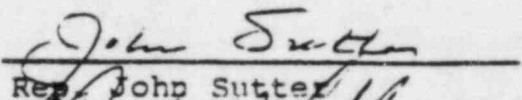
  
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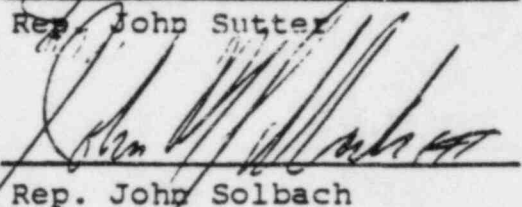
  
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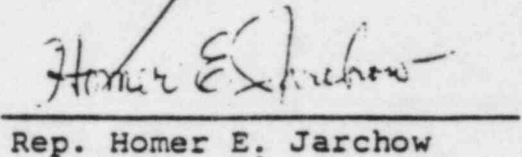
  
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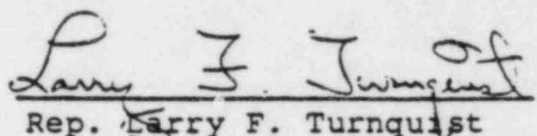
  
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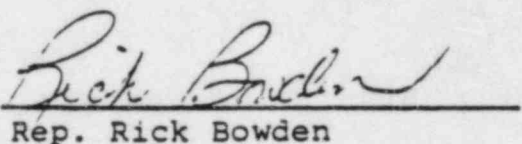
  
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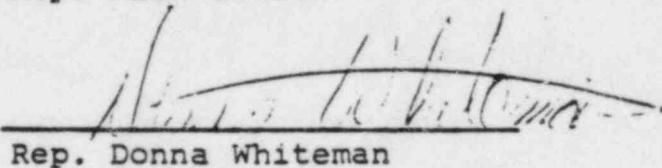
  
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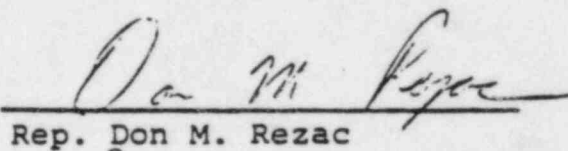
  
Rep. John Solbach

  
Rep. Homer E. Jarchow

  
Rep. Larry F. Turnquist

  
Rep. Rick Bowden

  
Rep. Donna Whiteman

  
Rep. Don M. Rezac

  
Rep. Diane Gjerstad

  
Rep. Jack Shriver

Duane A. Goossen  
Rep. Duane A. Goossen

Vincent K. Snowbarger  
Rep. Vincent K. Snowbarger

Denise C. Apt  
Rep. Denise C. Apt

Phil Kline  
Rep. Phil Kline

S.B. Sifers  
Rep. S.B. Sifers

Edwin Bideau, III  
Rep. Edwin Bideau, III

Clyde D. Graeber  
Rep. Clyde D. Graeber

Mike O'Neal  
Rep. Mike O'Neal

Al Ramirez  
Rep. Al Ramirez

Richard Eckert  
Rep. Richard Eckert

Martha Jenkins  
Rep. Martha Jenkins

Elaine Hassler  
Rep. Elaine Hassler

Elizabeth Baker  
Rep. Elizabeth Baker

Burt DeBaun  
Rep. Burt DeBaun

Gayle Mollenkamp  
Rep. Gayle Mollenkamp

Nancy Brown  
Rep. Nancy Brown

Rex B. Hoy  
Rep. Rex B. Hoy

Don Sallee  
Rep. Don Sallee



Phil Martin  
Sen. Phil Martin

JOSEPH F. NORVEILL  
Sen. Joseph F. Norvell

James L. Francisco  
Sen. James L. Francisco

Richard G. Gannon  
Sen. Richard G. Gannon

John Strick, Jr.  
Sen. John Strick, Jr.

William Roy, Jr.  
Rep. William Roy, Jr.

Bill Mulich  
Sen. Bill Mulich

Jesse Harder  
Rep. Jesse Harder

Nancy Parrish  
Sen. Nancy Parrish

L.V. (Sam) Roper  
Rep. L.V. (Sam) Roper

Eugene Anderson  
Sen. Eugene Anderson

Paul Feleciano, Jr.  
Sen. Paul Feleciano, Jr.

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Patricia Weaver  
Rep. Patricia Weaver

Donald Mainey  
Rep. Donald Mainey

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Bill Brady  
Rep. Bill Brady

Kathryn Sughrue  
Rep. Kathryn Sughrue

LeRoy E. Fry  
Rep. LeRoy E. Fry

C. C. Love  
Rep. C.C. Love

Michael J. Peterson  
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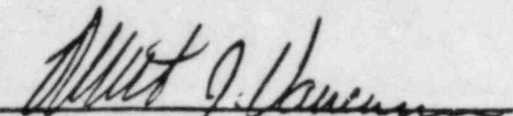
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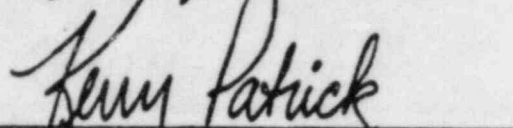
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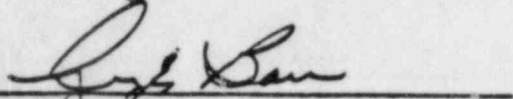
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Rep. Betty Jo Charlton

Bill Reardon  
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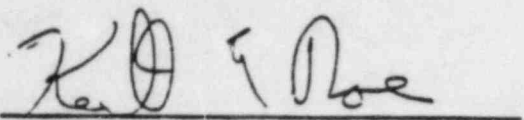
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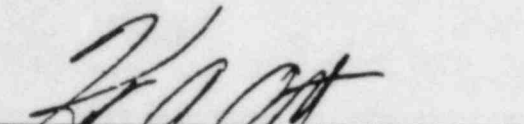
  
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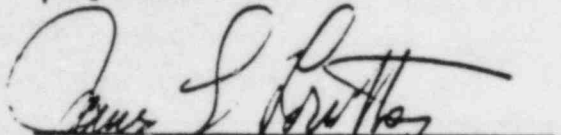
  
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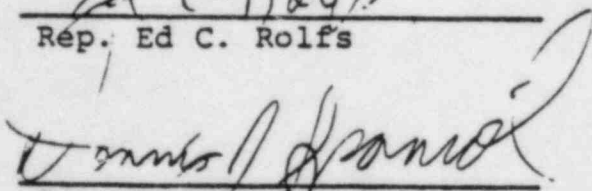
  
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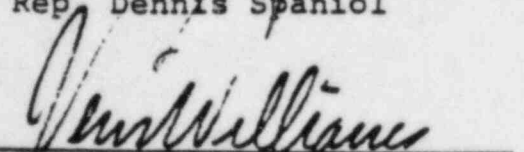
  
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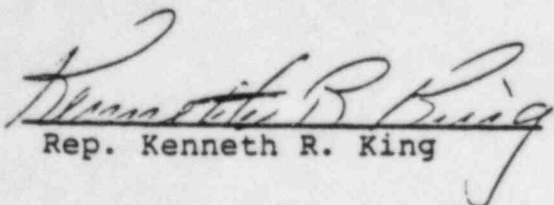
  
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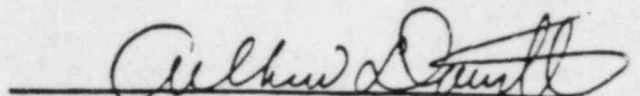
  
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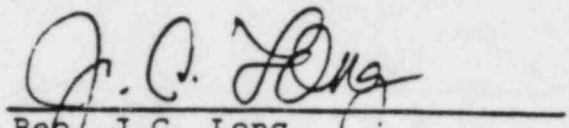
  
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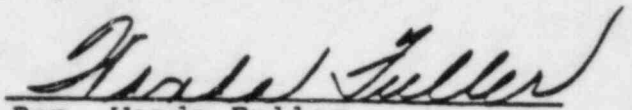
  
Rep. Dennis Spaniol

  
Rep. Vernon Williams

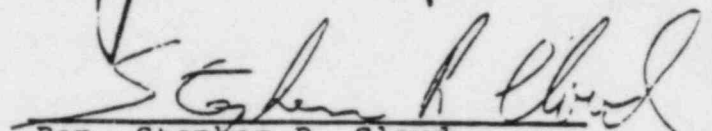
  
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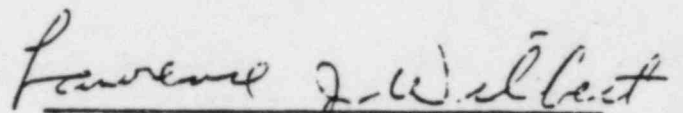
  
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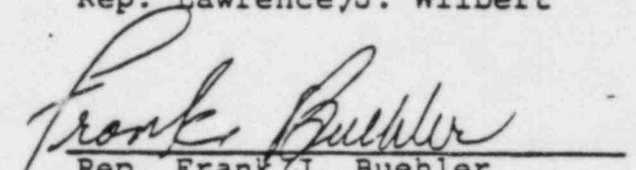
  
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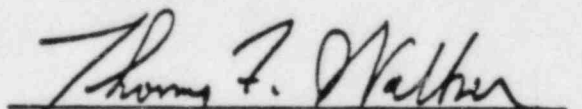
  
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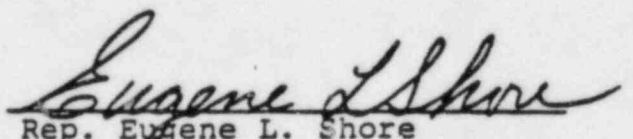
  
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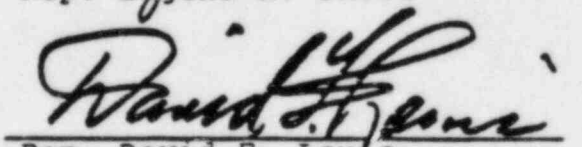
  
Rep. Lawrence J. Wilbert

  
Rep. Frank J. Buehler

  
Rep. Robert D. Miller

  
Rep. Thomas F. Walker

  
Rep. Eugene L. Shore

  
Rep. David F. Louis

*David G. Miller*

Rep. David G. Miller

*J.S. Duncan*

Rep. J.S. Duncan

*David Heinemann*

Rep. David Heinemann

State of Kansas



JOHN CARLIN  
MICHAEL LEMMON  
A. C. "PETE" LOUX  
KEITH R. HENLEY  
JUDITH A. MCCONNELL  
BRIAN J. MOULNE

Governor  
Chairman  
Commissioner  
Executive Secretary  
General Counsel

## State Corporation Commission

Fourth Floor, State Office Bldg.

Ph. 813286-3355

TOPEKA, KANSAS 66612-1571

November 5, 1984

Mr. Darrell Eisenhut  
Director of Reactor Licensing  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

50-482

708

Dear Mr. Eisenhut:

We have recently received from Kansas Gas & Electric Company a copy of NRC Inspection Report No. 50-482/84-22 in Docket No. 50-482 (Wolf Creek Generating Station). The report was generated following an inspection conducted between June 11, 1984 and September 28, 1984. Generally, the report concludes that two violations were identified: (1) failure to assure conformance of safety-related structural steel welds with requirements; and (2) failure to maintain adequate electrical separation. Specifically, the report cites a variety of problems which appear to be substantial:

During a review of QA/QC and Quality First personnel qualifications and subsequent interviews, the NRC inspector became aware of potential problems with corrective action reports CAR 29 and 31. The NRC inspector subsequently obtained copies of the two documents. CAR 1-W-0029 (initiated on March 22, 1983) states, in part, 'Subsequently to the issuance of CAR 1-W-0019, quality has instituted a random reinspection of accessible structural steel fillet welds in all Q buildings. It has been determined by the results of this reinspection that an unacceptable percentage of these welds are deficient in the auxiliary, control, and fuel buildings.' Attached documentation revealed that in the auxiliary building, 60 welds were inspected, with 53 being rejected. In the control and fuel buildings, 50 welds were inspected with 43 rejected, and 53 inspected with 35 rejections, respectively. Revision 2 to CAR 1-W-0029 stated in the disposition that the defective welds would be transferred to a Nonconformance Report (NCR). The NRC inspector obtained a copy of NCR ISN 10381PW which was used as the vehicle to carry out the direction provided by CAR 1-W-0029. It appears that DIC Project Welding Engineering personnel again reinspected the welds to

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more clearly define the nature and extent of the defects on a weld-by-weld basis. A majority of the defective welds were categorized as having "cosmetic" defects. The DIC recommended disposition was use-as-is for welds identified containing "cosmetic" defects. The NCR states that "cosmetic" defects include arc strikes, convexity, cold roll (understood to be synonymous with overlap), porosity, and acceptable amounts of undercut. The NRC inspector noted with respect to these defects that overlap is prohibited by the governing AWS D1.1-75 Code, and specific acceptance criteria for the other defects are also defined by this Code.

\* \* \*

On August 16, 1983, DIC personnel issued CAR 1-C-0031 which indicated that approximately 16.4 percent of the miscellaneous structural steel welding records for "Q" welding could not be located. After corresponding back and forth, DIC and the engineer concluded that it was acceptable for some amount of these records to be missing, provided that the quality inspection program was acceptable. Senior licensee QA management expressed to the NRC inspector that the program had obviously been fully successful since very few welds had been found to require repair after a substantial reinspection effort associated with CAR 29. The NRC inspector expressed concern with this approach to resolution and suggested that the licensee reevaluate their position.

\* \* \*

During the week of September 17, 1984, a reinspection of the identified structural members with the highest design loads or the lowest design strength safety margin was initiated. The reinspection identified a number of welds which do not meet drawing requirements. This information was presented to the NRC staff during a meeting conducted on September 25, 1984. In an effort to confirm certain of the identified conditions, the NRC inspector accompanied DIC welding inspectors into the reactor building to observe specific, identified weld joints. This observation confirmed the welding inspectors' findings; e.g., welds that are undersized and of insufficient length, lack of fusion, and missing welds.

The missing welds are from the same location in each of six pressurizer support connections. Certain of the other welds in the pressurizer support connections were

undersized and of insufficient length. Drawing No. C-05 2904 shows that various length 5/8-inch welds are required in 14 specific locations. Four locations required a 5/8-inch fillet weld of 8 inches in length. The actual welds in two of the locations measured between 3/8-inch and 1/2-inch by 5 inches in length, and 1/2-inch by 3 inches in length. The missing welds and the undersized, insufficient length welds are clearly not in compliance with the requirements of the drawing or AWS D1.1-75. The initial weld inspection records for these connections could not be located.

The NRC inspector accompanied two DIC welding inspectors for reinspection of nine structural steel connections in the auxiliary building. Drawing No. K6720, applicable to these connections, shows 12 weld locations per connection with certain of the welds requiring returns. Reinspection of the welds and returns involved provided the following summarized data:

- Missing welds	2
- Welds with insufficient length	9
- Undersized welds	6
- Undersize welds with insufficient length	2
- Overlength returns	44
- Undersize returns	25
- Undersize returns with insufficient length	1

The NRC inspector requested the initial weld inspection records for these welds and returns in the 9 reinspected connections. As of September 28, 1984, the only inspection records that were located pertained to 10 welds and 6 returns in one connection, and 8 welds and 4 returns in each of 3 other connections. These records did not indicate that the welds were anything other than acceptable. The licensee informed the NRC inspector of a situation where one inspection record for connection 524B2 clearly indicated by an attached sketch the existence of the a weld that reinspection found not to exist. This problem will be followed up in conjunction with the other structural steel problems.

The NRC inspector made a comparison between the existing initial inspection records and the results of

Letter Mr. Darrell Eisenhut  
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the reinspection effort in order to determine the validity of the initial records. The initial records show that the 10 welds with 6 returns in one connection were inspected and accepted on December 11, 1978. The reinspection identified one undersized weld, other undersized and overlength returns, and three overlength returns. The initial records for the other three connections show that eight welds with four returns per connection were inspected and accepted on September 8, 1979. The reinspection of these welds and returns identified two returns which were overlength and undersized and two returns which were overlength per connection.

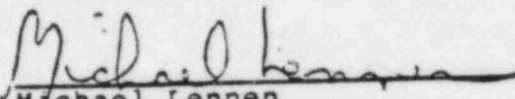
The failure to execute the required welding inspection program is a violation of Criterion X of Appendix B to 10 CFR Part 50. (482/8422-01).

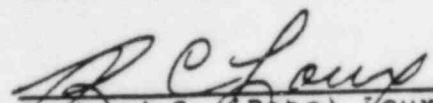
We note that you have recently been quoted by the press as indicating that these welding problems could portend extensive delays. We assume that you now question the most recent NRC case load forecast panel estimate for the date of fuel load. Due to the ratemaking impact of project delay, it is necessary that we inquire as to your best estimate at this time of the length of project delay occasioned by the defects identified in the above-referenced inspection report.

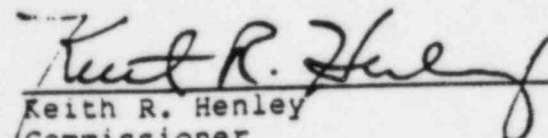
Thank you for your cooperation.

Sincerely,

KANSAS CORPORATION COMMISSION

  
Michael Lennen  
Chairman

  
Richard C. (Pete) Loux  
Commissioner

  
Keith R. Henley  
Commissioner

RF/jlm