

50-482/84-57



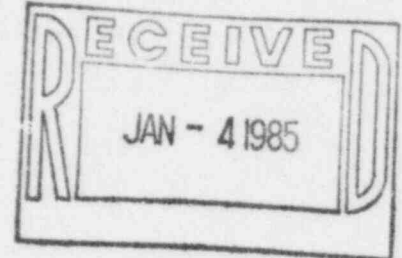
KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

December 31, 1984

*Planned
Docket
File*

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



KMLNRC 84-240
Re: Docket No. STN 50-482
Ref: Letter of 12/11/84 from GLKoester, KG&E
to RDMartin, NRC
Subj: FSAR Commitment Compliance Study

Dear Mr. Martin:

Attached is a copy of KG&E's FSAR Commitment Compliance Study Results Report, dated December 31, 1984. This report documents the completion of the review activities associated with the Wolf Creek Preoperational Test Program that were committed to in the Reference. The attached report supersedes the draft report provided to NRC personnel during the December 4, 1984 Enforcement Conference at Wolf Creek.

The primary differences between the December 31 report and the draft report are the following:

- The data base listing of requirements and their associated preoperational tests has been revised to expand the listing of preoperational tests where multiple tests are associated with a single requirement to eliminate duplication, and to correct minor errors and inconsistencies.
- A summary listing of the Regulatory Guides has been added to indicate which Regulatory Guides were reviewed and the results of that review, and the basis for not reviewing the remaining Regulatory Guides. The results of the review are listed either as "No New Req" (indicating that no requirements were found which had not already been identified in the FSAR review) or "New 'A' Item(s)" (indicating that additional requirements were identified which have been added to the data base listing).
- All previously open items have now been closed and included in the data base listing as "A" items. (In two cases, the procedures have been revised and are now awaiting final approval).
- The results of a separate activity to compare Technical Specification quantitative limits to corresponding preoperational test acceptance criteria has been appended to the report.

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As a result of our study, the following conclusions have been reached:

1. While the expansion of the review to include Regulatory Guides identified some requirements not previously identified in the FSAR review, in all cases the requirements were met by the preoperational tests. Although not considered an open item, it was noted that procedure SU3-GP02 incorrectly referenced R.G.1.136 rather than 1.18. The procedure reference has since been corrected.
2. The separate activity to compare Technical Specification quantitative limits to corresponding preoperational test acceptance criteria did not identify any inappropriate acceptance criteria.
3. The overall results of the study demonstrate a high level of confidence that previous test program preparation efforts aimed at assuring that FSAR commitments were met have been successful and that the relatively small number of exceptions identified have now been corrected.

The Reference also committed to the completion of a similar indepth commitment compliance review of the Initial Startup Test Program. Due to other priorities, that review is not yet complete. KG&E will forward the results of this second review to the NRC by January 10, 1985.

If you have any questions or desire further discussion on this matter, please contact Mr. Gene Rathbun of my staff.

Yours very truly

Kent R Brown

for

Glenn L. Koester
Vice President - Nuclear

GLK:kc

Attach

xc: WGGuldemond
HBundy
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