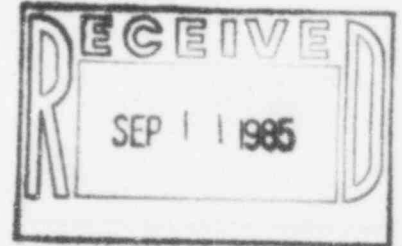




KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT, NUCLEAR

September 4, 1985



Mr. R.P. Denise, Director  
Division of Reactor Safety and Projects  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

KMLNRC 85-216

Re: Docket No. 50-482

Subj: Response to Inspection Report STN 50-482/85-23

Dear Mr. Denise:

This letter is written in response to your letter of August 8, 1985, which transmitted Inspection Report STN 50-482/85-23. As requested, the violation (482/8523-01), identified in the Inspection Report is being addressed in four parts.

- a) The reason for the violation, if admitted;
- b) The corrective steps which have been taken and the results achieved;
- c) Corrective steps which will be taken to avoid further violations; and
- d) The date when full compliance will be achieved.

1. Violation: Failure to Follow Plant Procedures

Finding:

10 CFR Part 50, Appendix B, Criterion V states, in part, "Activities affecting quality . . . shall be accomplished in accordance with these instructions, procedures, or drawings. . ."

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The following are excerpts from plant procedures that have been established in accordance with 10 CFR Part 50, Appendix B, Criterion V:

- ADM 01-041, "Plant Modification Request," Revision 4, dated February 23, 1985, in Section 2.3 states; "The Wolf Creek Generating Station Plant Manager will approve all modifications prior to their being implemented."
- ADM 01-057, "Work Request," Revision 7, dated May 13, 1985, in Section 2.1 states in part: "The work request is intended to document and control work activities involving safety related, special scope, and . . ."
- ADM 02-101, "Temporary Modification." Revision 12, dated May 16, 1985 which in Section 2.1, states in part; "It is the responsibility of the group leader (or designee) whose personnel are implementing a temporary modification to ensure the modification is necessary, correct, and to prepare the 10 CFR 50.59 applicability review for . . . The group leader (or designee) shall approve the modification in advance of the work being performed."

Contrary to the above, on May 24, 1985, the slide pole for containment water level indicator LF-LI-9 was observed to be inoperable due to an unauthorized modification in the form of tape wrapped around and obstructing the level indicator slide pole.

Response:

a) The reason for the violation if admitted:

While the specific activity which resulted in this incident could not be determined, the tape obstruction on the slide-pole is believed to have occurred during insulation activity in the general area of the instrument. Adhesive tape was found wrapped around the slide-pole approximately one foot above the containment floor. The presence of the tape on the slide-pole would have obstructed the instrument float from rising with containment water level above the elevation of the tape on the slide-pole. Shortly after this condition was identified, the tape obstruction was removed from the slide-pole and the instrument was returned to service.

This instrument is used for event identification during accident conditions when containment water level could reach a maximum of four and one half feet above the containment floor. Redundant

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containment water level instrument LF-LI-10 was in service during this time. Two additional fully qualified (Class IE) containment water level instruments EJ-LI-07 and EJ-LI-08 were also in service.

Since the duration of the out-of-service condition is believed to be greater than seven days, a violation of Technical Specification Action Statement 3.3.3.6a is considered to have occurred and was reported in Licensee Event Report 85-034-00.

b. Corrective steps which have been taken and the results achieved:

The tape was removed upon discovery. As a result of this event, the slide-pole for redundant containment water level instrument LF-LI-10 was inspected for obstructions. While no obstructions affecting operability were found in the accident monitoring range of the instrument (maximum flood level of four and one half feet above the floor) two obstructions were found at approximately six and seven feet above the floor. The obstructions to the slide-pole float in the extended range of the instrument involved a small drain pipe from a valve and a flexible conduit. They have been relocated to eliminate any possible interference.

c. Corrective steps which will be taken to avoid further violations:

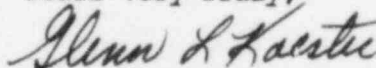
To prevent occurrences of similar situations, a letter has been issued to all organizations which may be called upon to perform work in the plant, instructing them to review this situation with their employees and to reiterate the requirements for specific prior approval before making any attachments to permanent plant equipment or structures.

d. Date when full compliance will be achieved.

Full compliance has been achieved.

Please contact me or Mr. Otto Maynard of my staff if you have any questions concerning this response.

Yours Very Truly,

  
Glenn L. Koester

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xc: PO'Connor (2)  
JCummins