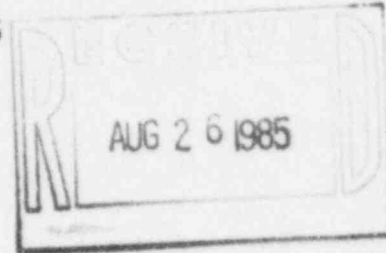




KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

August 23, 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 85-204

Re: Docket No. STN 50-482

Subj: Response to Inspection Report STN 50-482/85-19

Dear Mr. Denise:

This letter is written in response to your letter of July 26, 1985, which transmitted Inspection Report STN 50-482/85-19. As requested the violations (482/8519-01 and 02) identified in the Inspection Report are being addressed in three parts.

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

1. Violation (482/8519-01): Failure to Properly Update Procedure Manuals

Finding:

10 CFR Part 50, Appendix B, Criterion VI states, in part, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto. These measures shall assure that documents, including changes, are distributed to and used at the location where the prescribed activity is performed."

Also, Kansas Gas and Electric Company (KG&E) Administrative Procedure ADM 07-100, Rev. 24, states in part, in Section 5.5.1, "it is the responsibility of the manual holder to ensure procedures are updated on a regular basis and the manual is kept current."

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Contrary to the above, outdated procedures were found in KG&E Wolf Creek Generating Station (WCGS) Procedure Manuals located in the Technical Support Center (TSC) and Emergency Operations Facility (EOF) during an inspection performed on April 10 and 11, 1985. Examples of these discrepancies include the following:

TSC

1. Temporary Change Notice (TCN) MI 85-162 was not filed with Procedure CHM 01-004.
2. TCNs MA 85-594 and MA 85-611 were not filed with Procedure SYS BB-201.

EOF

1. TCNs MA 85-087, MA 85-217, and MA 85-439 were not filed with Procedure E-0.
2. TCNs MA 85-486 and MA 85-669 were not filed with Procedure SYS EF-200.

Response:

- a) Corrective steps which have been taken and the results achieved:

A 100% review of the procedures in the TSC and EOF was performed to bring them into compliance with 10CFR50, Appendix B, requirements. This effort was completed for both areas by April 30, 1985.

Surveillances were performed on the TSC procedures on April 12, 1985, April 22, 1985, April 26, 1985, May 20, 1985, and July 19, 1985. Surveillances were performed on the EOF procedures on April 18, 1985, April 24, 1985, April 30, 1985, May 22, 1985 and July 19, 1985. The results of these surveillances indicated an error rate of < 1% for the last three surveillances in each area.

Additionally, a surveillance of all other documents in the TSC and EOF was performed with an error rate of <1%.

- b) Corrective steps which will be taken to avoid further violation:

A full time Document Control Clerk has been assigned to the TSC/ EOF and reports functionally to the Site Emergency Planning Administrator. This individual is responsible for updating all TSC/EOF documents, including procedures on a daily basis.

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Internal surveillances will be performed and documented on all documents in the TSC and EOF on a periodic basis. These surveillances will be performed by personnel not assigned the document control responsibility of the TSC/EOF.

c) Date when full compliance will be achieved:

Full compliance has been achieved.

2. Violation (482/8519-02): Failure to Respond to Control Room Annunciator

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."

Plant Alarm Procedure ALR 00-0079F has been established in accordance with 10 CFR Part 50, Appendix B, Criterion V. ALR 00-0079F, Rev. 0, states that when Annunciator F-79 alarms, the operator should check Panel SQ-64 and:

1. Verify a high or low alarm spike.
2. Ensure loose parts recorder is running.
3. Identify the location of the alarm.
4. The shift supervisor shall make the decision to by-pass the alarm or take steps to mitigate potential RCS damage.
5. Notify reactor engineering for an engineering evaluation.

Contrary to the above, on April 28, 1985, Annunciator F-79 was allowed to be energized for an unknown length of time with a valid signal, without the control room operators recognizing the alarm was energized, determining if the alarm was valid, or determining if there was a need to take steps to mitigate potential reactor coolant system damage. The operators failed to follow Alarm Procedure ALR 00-0079F.

Response:

a) Corrective steps which have been taken and the results achieved:

Personnel directly involved with this incident have been counseled as to the required actions upon receipt of an annunciator alarm. A copy of this violation has been placed in Operations Required Reading so that all operations personnel will be cognizant of the importance of prompt operator action upon receipt of an annunciator alarm.

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b) Corrective steps which will be taken to avoid further violation:

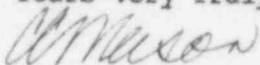
The Superintendent of Operations and Operations Coordinator-Operations have increased their casual surveillance of Operator awareness of annunciator status. During their tours of the Control Room they have questioned the on duty personnel of the reason and actions taken for various annunciators. In all cases where annunciators were illuminated, the Operators, when questioned, were cognizant of the reason for the alarm, or had already initiated actions to determine the cause.

c) 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,



for Glenn L. Koester
Vice President, Nuclear

GLK/see

cc: PO'Connor (2)
JCummins