

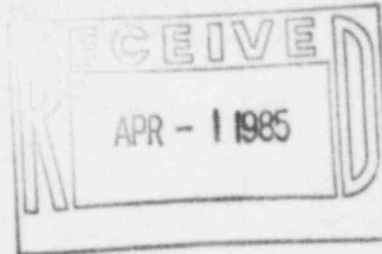


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

March 27, 1985

Mr. R.P. Denise, Director
Wolf Creek Task Force
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 85-079

Re: Docket No. STN 50-482

Subj: Response to Inspection Report 50-482/84-23

Dear Mr. Denise:

This letter provides the Kansas Gas and Electric Company (KG&E) response to your letter of February 25, 1985, which transmitted Inspection Report STN 50-482/84-23. As requested, the violation and deviation identified in the Inspection Report are being addressed in three parts:

- a) 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.

VIOLATION 482/8423-01: Failure to Specify Appropriate Criteria in a Component Support Design Specification to Assure Compliance with Regulatory Guide 1.85

Finding:

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be prescribed by and accomplished in accordance with appropriate instructions, procedures or drawings.

Appendix 3A of the SNUPPS Final Safety Analysis Report commits to compliance with the requirements of Regulatory Guide 1.85. The use of ASME Code Case 1644-7 (N-71-7), "Additional Materials for Component Supports, Section III, Division 1, Subsection NF, Class 1, 2, and 3 and MC Components Supports," is conditionally accepted by

8509040291 850816
PDR ADDCK 05000482
G PDR

Regulatory Guide 1.85. The stipulated conditions of acceptance are to either restrict the maximum measured ultimate tensile strength (UTS) of the component support material to 170 Ksi; or, if it is desired to use material with up to 190 Ksi UTS, to specify impact testing of the material in the Design Specifications. For the latter case, it is required to be demonstrated that (a) the impact test results for the material meet code requirements, and (b) the material is not subject to stress corrosion cracking by virtue of the fact that (1) a corrosive environment is not present and (2) the component containing the material has essentially no residual stresses or assembly stresses, and it does not experience frequent sustained loads in service.

Contrary to the above, SNUPPS Design Specification No. 10466-M-218A(Q), Revision 6 dated April 11, 1979, permitted the support manufacturer (i.e., Bergen-Paterson) to utilize ASME Code Case 1644-7 (N-71-7) for materials election, without imposing the restrictions on use contained in Regulatory Guide 1.85.

Response:

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

The support supplier, Bergen-Paterson, was contacted to assure that the requirements of Regulatory Guide 1.85 on the use of Code Case N-71 had been met. The supplier confirmed that, with one exception, they had not used any component support material listed in Code Case N-71 with a UTS greater than 170 Ksi. The exception was the use of ASTM A-574 cap screws with a UTS of up to 190 Ksi. Impact testing of this material had not been performed.

Bergen-Paterson, the Architect-Engineer Bechtel and KG&E, maintain that this use of A-574 cap screws without impact testing is acceptable for the following reasons:

- 1) The specific service conditions of the cap screws are such that a corrosive environment does not exist, the stresses are low, and they do not experience frequent sustained loads. Therefore, the cap screws are not susceptible to brittleness or stress corrosion cracking.
- 2) The faulted loads of the snubbers transferred via the cap screws are significantly lower than the UTS of the A-574 material.

3) The preload stress on the cap screws caused by the assembly torque results in a low initial stress when compared to the yield strength of the material. That is, the torque required by installation as shown on the Load Capacity Data Sheet will develop a stress of approximately 30% of the material minimum yield stress. No increase in stress occurs as a result of loads on the snubbers within the limits of the Certified Load Capacity Data Sheets.

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

Other pipe support suppliers, Corner & Lada and ITT Grinnell, provided written confirmation that they have not used any component support material listed in Code Case N-71 with a UTS greater than 170 Ksi. All the support suppliers also confirmed that they have not violated the additional weld rod control requirements imposed by Regulatory Guide 1.85 on paragraph 5.3 of Code Case N-71.

All three specifications, 10466-M-218A(Q), -218B(Q), and -216(Q) have been revised to include the restrictions of Regulatory Guide 1.85 on Code Case N-71.

c) The date when full compliance will be achieved:

Full compliance has been achieved.

VIOLATION 482/8423-02: Failure to Perform Nondestructive Examination of Component Support Field Welds in Accordance with Drawing Requirements

Finding:

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be accomplished in accordance with appropriate instructions, procedures, or drawings.

Daniel International (DIC) Drawing No. M06-EJ04-CO21/231(Q), Revision 5, requires that nondestructive examination of welds be performed in accordance with Subsection NF, Paragraph NF-5212 in Section III of the ASME code. Paragraph NF-5212 requires that full fillet welds be examined by either the magnetic particle or liquid penetrant examination methods.

Contrary to the above, the field weld (i.e., Weld 1) in the EJ04-CO21 component support, which was specified by the support manufacturer to be a full fillet weld, received only a visual examination and was not examined by either the magnetic particle or liquid penetrant method.

Response:

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

The proper nondestructive examination was performed on EJ04-CO21 and the results were documented.

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

A review of all Class 1 supports was performed to determine if there were any other welds that did not receive the proper nondestructive examinations. The results of this review and the corrective action were documented.

The personnel responsible for assigning NDE requirements were trained on the requirements for NDE of the specific support types that were of concern.

- c) The date when full compliance will be achieved.

Full compliance has been achieved.

VIOLATION 482/8423-03: Failure to Follow Procedures with Respect to Handling of Potentially Reportable Nonconformances

Finding:

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be accomplished in accordance with appropriate instructions, procedures, or drawings, and that these instructions, procedures, or drawings include acceptance criteria for determining that important activities have been accomplished.

Paragraph 15 of "Instructions for Completing Nonconformance Report (NCR)" in DIC Construction Procedure AP-VI-02 states, "Potential 50.55(e) or Part 21 - The Discipline Manager, after review of nonconformance, shall check the appropriate block. If the 'yes' block is indicated, refer to Paragraph 4.2.6 of this procedure for further action." Paragraph 4.2.6 states, "Evaluate NCR to determine if there is a potentially reportable nonconformance under the provisions of 10CFR 50.55(e) or Part 21, and check the appropriate box. When it is determined that there is a potentially reportable nonconformance, immediately hand carry a copy of the NCR to the KG&E Significant

Deficiency Coordinator/Construction where a 'WCGS Request for Reportability Evaluation' shall be generated and further action taken."

Contrary to the above, NCRs with the appropriate box checked off indicating potentially reportable conditions existed, were not immediately hand carried to KG&E's significant deficiency coordinator, as evidenced by the September 1984 date on the NCRs, and the DIC reportability evaluation dated December 1984.

Response:

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

Upon notification from KG&E relative to the above condition, DIC initiated the reportability evaluation form as required by DIC Procedure AP-IV-02. The evaluation was performed by KG&E's nuclear plant engineering group and was reported to the NRC by KG&E's licensing group on December 12, 1984.

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

It was determined that this matter was limited to three individuals in the DIC Hanger Engineering Department. These individuals have signature authority for the Project Discipline Manager. These three individuals, along with others within the DIC Hanger Engineering organization have signature authority for the Discipline Manager, and have been formally retrained concerning the procedural requirement for reportability.

- c) The date when full compliance will be achieved:

Full compliance has been achieved.

DEVIATION 482/8423-04: Failure of Procedure to Comply with Applicable ASME Code Requirements for Magnetic Particle Examination

Finding:

Paragraph T-734.2 in Article 7 of Section V of the ASME Code (1974 Edition through Summer 1975 Addenda) requires that a pole spacing of 3 to 6 inches be used for the yoke method of magnetic particle examination.

March 27, 1985

In deviation from the above, GEO Procedure No. 21.A.1, Revision 6, dated October 14, 1983, "Magnetic Particle Examination Dry Method," permitted a maximum pole spacing of 8 inches to be used for the yoke method.

Response:

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

- 1) RCI K-KGE-020M was generated to clarify the intent of code paragraph T-734.2 specified yoke pole spacing of 3 to 6 inches. The RCI states, in part, "The intent of this spacing is to provide some arbitrary distance between the yoke poles to help insure sufficient lifting power, thus insuring sufficient magnetism for magnetic particle examination."
- 2) A demonstration of the AC powered yoke, lifting a 10 lbs. weight at a pole spacing of 8", was successfully performed on September 6, 1984, thus satisfying the intent of code paragraph T-734.2. This was witnessed by a NRC Inspector and a KG&E Construction Quality Control Engineer. Reference KG&E QC Field Surveillance Report #WLR-85-374.

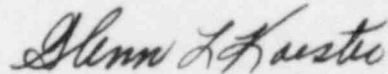
b) Corrective steps which will be taken to avoid further deviation from commitments made to the Commission:

GEO Construction Testing Procedure 21.A.1 - "Magnetic Particle Examination, Dry Method" was revised on January 22, 1985, to exactly quote the requirements of Code Paragraph T-734.2.

c) The date when full compliance will be achieved:

Full compliance has been achieved.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:bb
xc:PO'Connor (2)
JCummins
HBundy