Docket No.: 50-482

SEP 0 5 1985

Mr. Glenn L. Koester
Vice President - Nuclear
Kansas Gas and Electric Company
201 North Market Street
Post Office Box 208
Wichita, Kansas 67201

Dear Mr. Koester:

Subject: Request for Additional Information Regarding a 10 CFR 20 Respiratory Protection Iodine Filter Exemption Requests

The NRC staff is continuing its review of KG&E's 10 CFR 20 Respiratory Protection Iodine Filter Exemption request submitted by letter dated July 1, 1985. The information requested in the enclosure is necessary to permit the staff to complete its review.

Please provide the requested information with 60 days of your receipt of this letter.

Sincerely,

B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosure: As stated

cc: See next page

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PWOF
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cc:
Mr. Nicholas A. Petrick
Executive Director, SNUPPS
5 Choke Cherry Road
Rockville, Maryland 20850

Jay Silberg, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, NW
Washington, D.C. 20036

Mr. Donald T. McPhee
Vice President - Production
Kansas City Power & Light Company
1330 Baltimore Avenue
Kansas City, Missouri 64141

Ms. Mary Ellen Salva
Route 1, Box 56
Burlington, Kansas 66839

A. Scott Cauger
Attistant General Counsel
Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65101

Resident Inspector/Wolf Creek NPS
c/o U.S. Nuclear Regulatory Commission
P. O. Box 311
Burlington, Kansas 66893

Mr. Robert M. Fillmore
State Coporation Commission
State of Kansas
Fourth Floor, State Office Building
Topeka, Kansas 66612

Ms. Wanda Christy
515 N. 1st Street
Burlington, Kansas 66839

C. Edward Peterson, Esq.
Legal Division
Kansas Corporation Commission
State Office Building, Fourth Floor
Topeka, Kansas 66612

John M. Simpson, Esq.
Attorney for Intervenors
4350 Johnson Drive, Suite 120
Shawnee Mission, Kansas 66205

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Office of Executive Director
for Operations
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Mr. Allan Mee
Project Coordinator
Kansas Electric Power Cooperative,Inc.
P. O. Box 4877
Gage Center Station
Topeka, Kansas 66604

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Brian P. Cassidy, Regional Counsel
Federal Emergency Management Agency
Region I
J. W. McCormack POCH
Boston, Massachusetts 02109

cc:
Terri Sculley, Director
Special Projects Division
Kansas Corporation Commission
State Office Building, Fourth Floor
Topeka, Kansas 66612

Mr. Gerald Allen
Public Health Physicist
Bureau of Air Quality & Radiation
Control
Division of Environment
Kansas Department of Health
and Environment
Forbes Field Building 321
Topeka, Kansas 66620

Senior Resident Inspector/Wolf Creek NPS
c/o U.S. Nuclear Regulatory Commission
P. O. Box 311
Burlington, Kansas 66839

ENCLOSURE

WOLF CREEK GENERATING STATION

REQUEST FOR ADDITIONAL INFORMATION

IODINE FILTER EXEMPTION

1. Your submittal of July 1, 1985 indicates that the exemption can result in potential person-rem reductions over the life of the plant. Briefly discuss particular tasks you have identified which could result in such dose savings and/or provide examples of relevant industry experience in this area (e.g. Farley 1 & 2, San Onofre).

2. Discuss facility programs intended to preclude high radioiodine levels. Include a general description of fuel quality assurance and quality control, as well as routinely practiced operational techniques, engineering controls, and procedures used to prevent use of faulty fuel, prevent fuel damage, and minimize the radiological impact of potential fuel defects (e.g. coolant purification, chemistry control, sampling, degasification, planned decay, fuel sipping and replacement).

3. Provide a commitment that training programs will be modified and training will be conducted to instruct sorbent canister users and health physics personnel in the proper field use of these canisters, as well as the limitations and restrictions regarding their use. Identify the specific procedures related to such training and to use and control of these canisters.

4. Describe how vendor and facility quality assurance and quality control will be verified for the GMR-I canister. This should include a discussion of how the licensee will verify and accept MSA's QA procedures for the GMR-I canister (i.e. Mil Std 414), and how on-site quality control will be maintained to assure identification, use and storage of QA'd GMR-I canisters.

5. Provide a commitment that on-site storage in a cool, dry environment will meet QA Class A Storage as outlined in ANSI N45.2.2, or an equivalent inspectable storage criteria. Note that canister storage in field use/issue areas need not meet such criteria if such storage is temporary and related to field issue and use.

6. Provide a commitment to verify the effectiveness of GMR-I canister use, to include the following , or equivalent, controls:
   a. weekly whole body counts for individuals using the GMR-I canister for radioiodine protection;
   b. for individuals who exceed 10 MPC hours, a whole body count will be required prior to the individual's next entry into a radioiodine atmosphere;
   c. establish an uptake level beyond which further entry into a radioiodine atmosphere would be restricted, pending health physics evaluation (e.g. at 70 nCi);
   d. establish a data base of survey data and whole body counts to be used to evaluate the effectiveness of the program.

7. Provide additional details regarding the limitations and controls for use of the GMR-I canisters as follows:
   a. Identify those organic vapors of concern at Wolf Creek (e.g. freons, alcohols, carbon tetrachloride, paint fumes, EDTA, etc.) where GMR-I canisters are to be used or stored.
   b. Outline the methods and procedures to be used to preclude the presence of organic vaports in canister use areas, and briefly discuss detection and sampling methods to be used, where these are feasible. Outline the sampling program for radioiodines and what measures will be taken to establish baseline data for organics which are not readily sampled or detected.
   c. Discuss the frequency and conditions for determination of temperature and dew point/relative humidity during canister use. (120°F is acceptable if dew point does not exceed 107°).
8. Verify that facepiece protection factors will have been determined by fit test to be greater than 100 PF capability.
9. Identify existing requirements (related to Q471.7), such as technical specifications for main HEPA filter banks, which provide measures of control for the environments where GMR-I canisters will be used, and briefly indicate how they contribute to control of use and conditions.