

JAN 8 1985

MEMORANDUM FOR: D. R. Hunter, Chief, Reactor Project Branch 2  
L. E. Martin, Chief, Wolf Creek Task Force  
G. L. Madsen, Reactor Inspector, RPB2

FROM: R. P. Denise, Director, Division of Reactor Safety  
and Projects

SUBJECT: OI EVALUATION OF KG&E INVESTIGATIVE PROGRAM

Attached is a copy of the OI evaluation of the KG&E investigative program prepared by William J. Ward, dated December 21, 1984. Also attached is a memo from B. Hayes to R. Martin requesting that the document not be disclosed.

Mr. Madsen should review the document in detail to determine appropriate RIV action and discuss his evaluation and suggested actions with us.

Original Signed By:

Richard P. Denise

R. P. Denise, Director  
Division of Reactor Safety  
and Projects

Attachment:  
As stated

DRSP *RM*  
RPDenise:jc  
1/8/85

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STEPHENS86-59 PDR

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APR 10 1985

MEMORANDUM FOR: Hugh L. Thompson, Jr., Director  
Division of Licensing, NRR

FROM: R. P. Denise, Director  
Division of Reactor Safety and Projects

SUBJECT: KANSAS GAS AND ELECTRIC COMPANY (KG&E)  
QUALITY FIRST PROGRAM AT WOLF CREEK (DN: 50-482)

We have previously discussed the Wolf Creek Quality First program with your staff in order to ensure that they were fully informed about the activities of IE and RIV in this area. Based on your continuing interest in this subject, I thought it might be useful to you to provide a brief description of the perspective, RIV activities, results of activities, etc.

RIV viewed the Quality First program of KG&E as an important element in KG&E's responsibilities to ensure that the Wolf Creek plant was constructed in accordance with requirements. It was intended by KG&E to provide a path separate from the line organization for the receipt and handling of concerns about construction quality, among other things, raised by KG&E and KG&E contractor employees. The provision of this pathway may have had the effect of KG&E receiving and dispositioning concerns (or allegations) which otherwise might have been brought to the NRC as the only separate path. It was this context which prompted RIV to review the Quality First program to determine that it was being appropriately implemented, even though we recognized that the NRC had no specific criteria against which to judge acceptability of the program. In the absence of formal NRC guidance, the Wolf Creek Task Force adopted an approach which can be expressed roughly as determining whether KG&E handled the concerns and allegations in the manner in which they would have been handled by the NRC if the NRC had been the recipient.

One of the important aspects related to the KG&E program is organizational independence within KG&E. Early in the Task Force effort, we reached the conclusion that the planned reporting level was not sufficiently high, and KG&E raised that level in August 1984 at our suggestion.

*RP*  
RIV-DRSP  
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Apr 17 1985

The Wolf Creek Task Force requested assistance from IE in an initial assessment of the KG&E Quality First program. This request is documented in a memorandum to Richard C. DeYoung from Richard P. Denise, dated September 24, 1984 (copy attached). The assessment was to focus on structure and implementation of the program. I had asked OI to participate on the IE/RIV team, but they declined. OI did produce a separate report primarily related to qualification of personnel as investigators, and the handling of allegations related to wrongdoing (such as drug use); you may wish to obtain a copy of the OI report on this review.

The requested IE/RIV team review is documented in NRC Inspection Report 50-482/84-37, dated October 24, 1984 (copy attached). The transmittal letter to KG&E, dated November 2, 1984, notes that the program had recently undergone change, and cautions KG&E to be alert to indications of deleterious changes in program implementations.

For completeness, I also attach NRC Inspection Report 50-482/84-12, dated September 27, 1984, which includes some observations on the Quality First program. The lead inspector who performed this effort had identified the potential problem in reporting level, but this is not recorded in the report.

The Wolf Creek Task Force has continued to monitor the KG&E Quality First program and its implementations. NRC Inspection Reports 50-482/84-48 (dated December 18, 1984), 50-482/84-52 (dated January 15, 1985), and 50-482/85-03 (dated March 1, 1985), dealing with allegations and the Quality First program have been prepared; a copy of each of these reports is attached. The Wolf Creek Task Force has routinely documented the substance and disposition of allegations in inspections reports, and there are many inspection reports, other than those cited, which contain such information; your staff should have copies of these reports.

The Wolf Creek Task Force has reviewed a high percentage of the Quality First files to ascertain appropriateness of action. In addition, we found that the NRC had received allegations which were the same as, or similar to, some of those received by KG&E Quality First. A comparison of the NRC actions and the KG&E actions was made in these cases, and we found no substantial differences.

APR 10 1985

I believe that you will find this information helpful. If you need additional information, or wish to discuss these items, please call me (FTS: 728-8106).

Original Signed By:

Richard P. Denise

R. P. Denise, Director  
Division of Reactor Safety  
and Projects

Attachments:

1. Memo, R. P. Denise to R. C. DeYoung,  
dated 9/24/84
2. NRC IR 50-482/84-37, dated 11/2/84
3. NRC IR 50-482/84-12, dated 10/12/84
4. NRC IR 50-482/84-48, dated 12/19/84
5. NRC IR 50-482/84-52, dated 1/23/85
6. NRC IR 50-482/85-03, dated 3/1/85

cc wo/attachments:

R. D. Martin, RIV  
J. M. Taylor, IE  
L. E. Martin, RIV