



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT-OPERATIONS

November 17, 1978

Mr. W.C. Seidle, Chief
Reactor Construction and Engineering
Support Branch
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Response to Inspection Report 50-482/78-11

Dear Mr. Seidle:

This letter is written in response to your letter of October 18, 1978 which transmitted Inspection Report 50-482/78-11. As requested, each finding is 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 non-compliance, and
- c) The dates when full compliance will be achieved.

A. Failure to Follow Specifications for Adjacent Cadweld Staggering.

Finding

During the inspection on September 18-21, 1978, the IE Inspector identified two instances of rebar rework in the reactor containment wall involving: (1) Cadwelds F14V8 and F14V9; and (2) Cadweld P14H38 where the staggering of adjacent Cadwelds was less than one foot by approximately 4-5 inches. These Cadwelds had been inspected by QC personnel.

Response

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

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Cadwelds F14V8 and F14V9 were cut out and replaced with Cadwelds J14V44 and J14V45 staggered greater than twelve (12) inches from adjacent Cadwelds.

Cadweld P14C38 was cut out. A new bar was fabricated and installed. Cadweld J14C63 then replaced P14C38 staggered in excess of twelve (12) inches from the adjacent Cadwelds.

- b. Corrective steps which will be taken to avoid further noncompliance.

The Cadweld Foreman and the Quality Control Inspectors responsible for Cadweld inspection were notified on September 21, 1978, as to the special requirements pertaining to the addition of Cadwelds. A formal class has since been held instructing the Quality Control Cadweld Inspectors regarding the requirements of QCP-IV-102 and Specification 10466-C112.

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

Full compliance achieved on September 21, 1978.

B. Failure to Document Housekeeping Inspection.

Finding

Although inspections for August and September, 1978 of the Auxiliary Building, Control Building and Reactor Building had been made, as confirmed by the Project Safety Engineer, they were not documented as required.

Response

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

We have reviewed our inspection records and observed that the Inspection Reports in August 1978 and September 1978, were in the Safety Department's file but had never been sent to Document Control as Q.A. Records. Documentation of Housekeeping Inspection Records have now been forwarded to Document Control for storage.

- b. Corrective steps which will be taken to avoid further noncompliance.

Documentation of Housekeeping Inspection Reports are now being forwarded to Document Control for storage.

Project Safety Engineer issued a memorandum (November 1, 1978) explaining the documentation procedure of Housekeeping Inspection Reports. Also, on November 2, 1978, a training session on documentation of Housekeeping Inspection Report was conducted.

c. The date when full compliance will be achieved.

Full compliance achieved on November 2, 1978.

C. Failure to have Fork Lift Loading Certifications.

Finding

On September 21, 1978, maximum load parameter certifications for two fork lift units were not in the possession of either the licensee or the contractor and consequently were not retrievable. The two fork lift units used in the warehouse area were identified as: Yale, Model No. GP-060 (6000 pound capacity), PO No. 7158-NS-28021 and Pettibone Super 8 Carylift, Model No. 8-4A (8000 pound capacity), PO No. 7158-NS-28039.

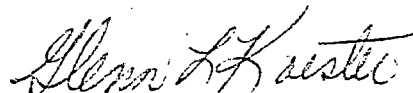
Response

The Yale and Pettibone fork lift units identified in the subject report are used for lifting and transporting equipment and materials in the warehouse area. These units are not used for hoisting. Our QA program includes requirements from ANSI Standard N45.2.2 which invokes ANSI Standards B30.2.0, B30.5 and B30.6. These standards cover different types of hoisting equipment (cranes) and do require that crane manufacturers certify the various parameters for the maximum load to be handled. However, ANSI Standard N45.2.2 does not specifically address lifting equipment (such as fork lift units) and does not invoke ANSI Standard B56.1 for fork lift units. B56.1 does not require the manufacturer to certify the lifting capacity.

In consideration of the above, we do not believe we have a commitment to obtain certificates for fork lift units. However, we will contact the manufacturers of the two units and attempt to obtain load capacity certificates. We will advise your inspectors regarding our success in obtaining the certificates.

Please advise if you need further information.

Yours very truly,



GLK:bb
cc: JOArterburn
EWCreele
WEHitt