

REGION IV
11 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

April 11, 1979

In Reply Refer To: RIV Docket No. STN 50-482/Rpt. 79-04

Kansas Gas and Electric Company
ATTN: Mr. G. L. Koester
Vice President-Operations
Post Office Box 208
Wichita, Kansas 67201

Gentlemen:

This refers to the inspection conducted by Mr. C. R. Oberg and other members of our staff during the period March 5-8, 1979, of activities authorized by NRC Construction Permit No. CPPR-147 for Wolf Creek, Unit No. 1, and to the discussion of our findings with you and other members of your staff at the conclusion of the inspection. This also refers to a series of visits made to the Portland Cement Association (PCA) during the months of February and March 1979, and to our meeting with you and members of your staff on March 15, 1979, in the Region IV office.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspectors.

We have also examined actions you have taken with regard to previously identified inspection findings. The status of these items is identified in paragraph 2 of the enclosed report.

During the inspection, it was found that certain activities under your license appear to be in noncompliance with Appendix B to 10 CFR 50 of the NRC Regulations, "Quality Assurance Criteria for Nuclear Power Plants." The item of noncompliance and references to the pertinent requirements are identified in the enclosed Notice of Violation.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within 30 days of your receipt of this notice, a written statement or explanation

9 536 303 126 P

in reply including: (1) corrective steps which have been taken by you. and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

During this particular inspection, only one item of noncompliance was identified. However, during the inspection our review of events leading to your stop-work order relative to Class 1 concrete raised general concern on our part in terms of your control of the quality of construction. Of further concern, Region IV (wi 1 support from Regions I, II and III) has conducted over thirty inspections of construction activities associated with the Wolf Creek plant since issuance of a Construction Permit in May 1977. During this twenty-two month period, thirty-one items of noncompliance have been detected, twenty-two of which involved Criterion V of Appendix B to 10 CFR Part 50 for failure to follow or provide procedures on safety related activities. On several occasions during the twenty-two month period, the Region IV Project Inspector discussed QA staffing concerns with you.

This matter is documented in IE Inspection Reports 77-05, 77-07, 77-09 and 78-08. Moreover, similar concerns were expressed by the Reactor Construction Branch Chief during meetings with you and your staff on August 9, 1977, and December 5, 1978. This matter, along with the concern over the numerous items of noncompliance involving Criterion V, was also the subject of an enforcement meeting conducted by the Region IV Construction Branch Chief in the corporate offices of KG&E on August 1. 1978, and is documented in IE Inspection Report No. 78-09. During these several meetings, commitments were made by KG&E site and corporate management to intensify the on-site QA surveillance program. It was not until after the concreting problems were experienced in December 1978, which led to an eighty-nine day hold on placement of safety related concrete and the recent stop-work order of March 8, 1979, that additional QA people were added to the site QA organization.

In view of the foregoing, and in the interest of clear understanding of the courses of action available to the Commission if a continuing pattern of noncompliance persists, upon receipt of this letter please contact me to discuss arrangements for a meeting to be held in the Region IV office. The general purpose of the meeting will be to discuss:

The specific programmatic and personnel plans for prompt identifi-1. cation, and correction of, the factors which have caused an apparent degradation of management controls and which have resulted in personnel errors leading to significant events and noncompliances.

2. The schedule for corrective action.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If the report contains any information that you believe to be proprietary, it is necessary that you submit a written application to this office, within 20 days of the date of this letter, requesting that such information be withheld from public disclosure. The application must include a full statement of the reasons why it is claimed that the information is proprietary. The application should be prepared so that any proprietary information identified is contained in an enclosure to the application, since the application without the enclosure will also be placed in the Public Document Room. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

K. V. Seyfrit

Director

Enclosures:

1. Appendix A, Notice of Violation

2. IE Inspection Report No. STN 50-482/79-04