



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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Docket No. STN 50-482

MAR 20 1980

Mr. Glenn L. Koester  
Vice President - Operations  
Kansas Gas & Electric Company  
201 North Market Street  
Wichita, Kansas 67201

Dear Mr. Koester:

SUBJECT: QA PROGRAM FOR DESIGN CONSTRUCTION AND FIRE PROTECTION

We have completed our review of the Wolf Creek Plant specific quality assurance program description included in the SNUPPS submittal of December 20, 1979. From our review we have determined that we need additional information as set forth in Enclosure 1. Questions regarding the SNUPPS portion of the December 20, 1979 submittal were forwarded to SNUPPS (Mr. N. A. Petrick) by letter dated January 22, 1980.

Additionally, as a result of our review of your Fire Protection Quality Assurance Program also forwarded in the SNUPPS submittal of December 20, 1979, we find that we need additional information as set forth in Enclosure 2.

Please notify us as to when we can expect responses to this request for information. If questions arise regarding this request, please contact us.

Sincerely,

*Olan D. Parr*  
Olan D. Parr, Chief  
Light Water Reactors, Branch No. 3  
Division of Project Management

Enclosures:  
As stated

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Mr. Glenn L. Koester

MAR 20 1980

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ENCLOSURE 1

WOLF CREEK GENERATING STATION (SNUPPS)

Request for Additional Information

1. Reinstate or justify the deletion of "The committee shall prepare a response to the citation and initiate appropriate corrective action or verify that proper corrective action has already taken place" from the fourth paragraph in 17.1.1.1.3 (page 17.1-7).
2. Since the QA program for the operations phase is described in the FSAR for Wolf Creek, delete the last sentence from 17.1.1.7 (page 17.1-8) which states: "The Plant Staff will be assisted by at least one quality assurance engineer stationed at the plant."
3. The description of the QA program for the Wolf Creek Generating Station refers to PSAR Section 17.1. (See the third paragraph on page 17.1-17 for example.) Since the SNUPPS submittal of December 20, 1979 includes the "Quality Assurance Program for Design and Construction," which updates PSAR Chapter 17, change references to PSAR Section 17.1 to reference the appropriate sections of this later QA program description.
4. The fourth paragraph on page 17.1-17 and the first and fifth paragraphs on page 17B-9 refer to Table 3.2-1 of the Standard Plant PSAR for the identification of safety-related items. However, page 17.1-10 of the Wolf Creek portion of the December 29, 1979 submittal also refers to Section 3.8.4 of the Wolf Creek portion (or addendum) of the PSAR. It appears that the three aforementioned paragraphs should also refer to Section 3.8.4. Please clarify.
5. Reinstate or justify the deletion of "inspection trip reports" from the records to be furnished by Bechtel and Westinghouse as per the last paragraph on page 17.1-56.
6. Item (i) at the top of page 17B-4 indicates that the Daniel Regional QA Manager is responsible to review and concur with the QA program of selected suppliers, while item (j) at the middle of page 17B-8 indicates that the Daniel Quality Control Manager is responsible to review the QA/QC programs of suppliers. Clarify that the QC Manager's review of QA programs of suppliers not selected for review and concurrence of the Regional QA Manager includes the concurrence responsibility.
7. Explain the deletion of procedures for controlling special processes from part 17B.1.1.2 responsibilities of Technical Services.
8. Discuss the significance of changing "decisions" to "problems" in part (d) at mid page 17B-5 and part (g) at mid page 17B-8.

9. Explain the significance of deleting "certification of the assigned construction" from the responsibilities of the Daniel Quality Control Manager at the bottom of page 17B-7.
10. Explain the significance of the change to the second paragraph of 17B.1.2 from "Prior to issuance, all procedures and instructions are forwarded to KG&E for review and final approval," to "Prior to issuance, procedures are forwarded to KG&E for review and final approval."
11. Delete or justify the addition of "inadvertent" to the second sentence on page 17B-18 which states "Identification and control measures shall be provided to prevent the inadvertent use or installation of incorrect or defective material, parts, and components."
12. The fire protection QA program for the Wolf Creek Generating Station is not clear. While providing a general commitment to selected portions of the overall QA program (the reference to "Chapter 17.0 of this PSAR Addendum" should be changed to reflect the SNUPPS submittal of December 20, 1979 as in item 4 above), part 17C then limits the commitments such that the general commitment appears meaningless, and the limiting commitments do not appear to be completely responsive to Mr. Vassallo's letter of August 29, 1977. Please clarify.
13. Discuss how the QA program for non-Category I Seismic Systems provided in part 17C of the Wolf Creek submittal meets the pertinent QA requirements of Appendix B to 10 CFR Part 50.

ENCLOSURE 2

Callaway Plant &  
Wolf Creek Generating Station

Questions on Fire Protection QA Program

1. For design and installation activities after receipt of the Vassallo letter of August 29, 1977, include a commitment in the second paragraph of criterion 2 that these activities will be accomplished in accordance with documented instructions, procedures, and drawings.
2. Provide a statement under the third paragraph of criterion 2 that "appropriate fire protection requirements" include such things as precautions, control of ignition sources and combustibles, provisions for backup fire protection if the activity requires disabling a fire protection system, and restriction on material substitution unless specifically permitted by design and confirmed by design review.
3. Under criterion 4.0, "Inspection," provide a commitment that inspections related to the fire protection program include the emergency lighting and communication equipment.
4. The third paragraph under criterion 4 states that "Inspections are (or "will be") performed by individuals other than those who performed the activities being inspected." It is the staff position that these inspections be performed by QA personnel in order to assure sufficient independence of the inspector from the individual whose work is being inspected and from undue influence from cost and schedule. Commit to meet this staff position or provide an alternative for our evaluation. Also provide a commitment that the inspection personnel are knowledgeable in the design and installation requirements for fire protection.
5. Under criterion 4.0, "Inspection," provide a commitment that the QA program for fire protection includes inspection procedures, instructions, and check lists which provide for:
  - a. Identification of characteristics and activities to be inspected;
  - b. Identification of the individuals or groups responsible for performing the inspection operation;
  - c. Acceptance and rejection criteria;
  - d. A description of the method of inspection;
  - e. Recording evidence of completing and verifying a manufacturing, inspection or test operation; and
  - f. Recording inspector or data recorder and the results of the inspection operation.
6. Under criterion 4.0, "Inspection," include a commitment that periodic inspections of fire protection systems, emergency breathing and auxiliary equipment,



emergency lighting, and communication equipment will be made to assure the acceptable condition of these items.

7. Under criterion 5, "Test and Test Control," provide commitments to the following:

A test program shall be established and implemented to assure that testing is performed and verified by inspection and audit to demonstrate conformance with design and system readiness requirements. The tests are performed in accordance with written test procedures, and test results are properly evaluated and acted on. The test program includes

- a. Installation Testing - Following construction, modification, repair or replacement, sufficient testing is performed to demonstrate that fire protection systems, emergency lighting and communication equipment will perform satisfactorily in service and that design criteria are met. Written test procedures for installation tests incorporate the requirements and acceptance limits contained in applicable design documents.
  - b. Periodic Testing - The schedules and methods for periodic testing are developed and documented. Fire protection equipment, emergency lighting, and communication equipment are tested periodically to assure that the equipment will properly function and continue to meet the design criteria.
  - c. Programs are established for QA/QC to verify testing of fire protection systems and to verify that test personnel are effectively trained.
  - d. Test results are documented, evaluated, and their acceptability determined by a qualified responsible individual or group.
8. Under criterion 7, "Nonconforming Items," indicate that nonconforming emergency lighting and communication equipment is controlled as part of the QA program for fire protection.
9. Under criterion 7, "Nonconforming Items," provide a commitment that procedures identify the individuals or groups delegated the responsibility and authority for the disposition and approval of nonconforming items.
10. Under criterion 10.0, "Audits," provide a commitment that follow-up action is taken by responsible management to correct deficiencies revealed by audit.
11. Under criteria 1, "Design Control and Procurement Document Control," and 3, "Control of Purchased Material, Equipment, and Services," provide a commitment that the requirements of the corresponding criteria of the Vassallo letter of August 29, 1977 have been met since receipt of the letter and will continue to be met as long as such activities are performed unless the NRC is notified otherwise.
12. (Callaway Plant only) Replace or justify the deletion of "receipt" inspection under criterion 1.

POOR ORIGINAL