

THIS DOCUMENT CONTAINS  
POOR QUALITY PAGES

TERA  
Lochd 50-482

SSINS NO. \_\_\_\_\_

TERA \_\_\_\_\_

EXEMPT \_\_\_\_\_

JUL 7 1980

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

Dear Ms. Christy:

This is in response to your letter dated September 4, 1979, to the Secretary of the Department of Energy regarding construction problems associated with the nuclear power plant being built by the Kansas Gas and Electric Company at the Wolf Creek site near Burlington, Kansas. After the response to you dated October 2, 1979 from the Department of Energy your letter was forwarded to the NRC for action.

One of your major concerns involved the adequacy of the concrete in the base mat. The enclosure to my letter to you dated July 18, 1979, contained specific information in support of the NRC's conclusion that the base mat as completed and re-analyzed using the actual low result values of the 90-day test cylinders was adequate to meet the loading combinations and stress limits set forth for the Wolf Creek plant. Appendix E to my letter was very specific in how this determination was made.

With regard to your suggestion that "an investigation of the NRC concerning this particular problem, and particularly an investigation of Region IV in Arlington, Texas" should be completed we want to provide the following information. A similar request was made on July 30, 1979 by the Kansas State Building and Construction Trades Council of the Comptroller General of the United States (See Enclosure 1). The General Accounting Office has completed its actions and a copy of the letter that was sent to the Trades Council is enclosed (Enclosure 2). I also responded to the items that were contained in the Trades Council's letter. My response is enclosed as Enclosure 3.

One of your other concerns related to Daniel International and their involvement in the construction of the plant. Some clarifications are necessary on this issue. Daniel International does not hold a construction permit issued by the NRC. That permit is held by the utility, Kansas Gas and Electric Company. Daniel International is under contract to the utility as the constructor of the Wolf Creek plant. Regarding the quality assurance program there have been numerous inspections which included reviews of the licensee's quality assurance program conducted in the period from May of 1974 until the construction permit was issued in May of 1977. Various nonconformances were found in the licensee's program as well as that of Daniel International by NRC inspectors. All problems that the NRC were able to detect or anticipate were corrected prior to the NRC making a finding of an acceptable application for the construction permit. The problems that have arisen in the area of quality assurance relate to the implementation of the program. It is our opinion that your characterization that the unit is being built "through trial and error method" is incorrect.

80 07250633

Ms. Wanda Christy

- 2 -

With regard to the items contained in the news article addressing the construction activities at Wolf Creek, I wish to provide the following information. The reference material which was apparently used by Mr. Max McDowell consisted, at least in part, of IE Inspection Reports STN 50-482/79-04 through 79-09. Enclosure 5 addresses the ten separate subjects included in the article. The uncertainty referred to regarding the acceptability of the base mat concrete has already been addressed.

Under the requirements of 10 CFR 2.206, a supplement to the denial was sent to you and other petitioners in a letter dated January 31, 1980. By action SECY-A-80-32 the Commission sustained the denial (See Enclosure 4). It is our opinion that the quality assurance program at the Wolf Creek site is adequate to control the safety-related construction which is being completed.

If you have further questions, please contact us.

Sincerely,

*\*Original Signed By  
R. C. DeYoung\**

Victor Stello, Jr.  
Director  
Office of Inspection  
and Enforcement

Enclosures:

1. Ltr. from Kansas State Building Trades Council (KSBTC) to Elmer Staats, 7/30/79 with ltr. of 8/8/79 to Chairman Hendrie.
2. Ltr. to Mr. Thompson (KSBTC) from Dexter Peach, GAO, 10/13/79.
3. Ltr. to Mr. Thompson (KSBTC) from Victor Stello, NRC 10/2/79.
4. Memo from Chilk addressing action on SECY-A-80-32, dated 3/31/80
5. Comments on McDowell article of 8/23/79
6. Appendix A

Distribution: w/incoming & enclosures:

W. J. Dircks, EDO	D. Thompson, IE	PDR (50-482)
H. R. Denton, NRR	H. D. Thornburg, IE	LPDR (50-482)
H. K. Shapar, ELD	G. W. Reinmuth, IE	IE Files (50-482)
J. P. Murray, ELD	K. V. Seyfrit, RIV	Central Files
J. Cook, MPA	R. E. Shewmaker, IE	EDO Reading
V. Stello, IE	L. N. Underwood, IE	(EDO-7492)
R. C. DeYoung, IE	(H11-002067-H06)	IE Reading

SEE PREVIOUS YELLOW FOR CONCURRENCES

WPU:SM	RCI:IE	RCI:IE	RCI:IE	ELD	DD:IE
7/2/80	RESheemaker	GWReinmuth	HDThornburg	JPMurray	RCDeYoung
Job A(3)	7/ /80	7/ /80	7/ /80	7/ /80	7/2/80

Stello 7/2/80

Ms. Wanda Christy

- 2 -

With regard to the items contained in the news article addressing the construction activities at Wolf Creek I wish to provide the following information. The reference material which was apparently used by Mr. Max McDowell consisted, at least in part, of IE Inspection Reports STN 50-482/79-04 through 79-09.

→ Enclosure 5 addresses the ten separate subjects included in the article. The uncertainty referred to regarding the acceptability of the base mat concrete has already been addressed.

In a separate letter sent to you and the other petitioners under the requirements of 10 CFR 2.206 a supplement to the denial was sent on January 1, 1980. By action SECY-A-80-32 the Commission sustained the denial (See Enclosure 4). It is our opinion that the quality assurance program at the Wolf Creek site is adequate to control the safety-related construction which is being completed.

If you have further questions, please contact us.

Sincerely,

Victor Stello, Jr.  
Director  
Office of Inspection  
and Enforcement

Enclosures:

1. Ltr. from Kansas State Building Trades Council (KSBTC) to Elmer Staats, 7/30/79 with ltr. of 8/8/79 to Chairman Hendrie.
2. Ltr. to Mr. Thompson (KSBTC) from Dexter Peach, GAO, 10/13/79.
3. Ltr. to Mr. Thompson (KSBTC) from Victor Stello, NRC 10/2/79.
4. Memo from Chilk addressing action on SECY-A-80-32, dated 3/31/80
5. Comments on McDowell article of 8/23/79
6. Appendix A

Distribution: w/incoming & enclosures:

W. J. Dircks, EDO  
H. R. Denton, NRR  
H. K. Shapar, ELD  
J. P. Murray, ELD  
J. Cook, MPA  
V. Stello, IE  
R. C. DeYoung, IE

D. Thompson, IE  
H. D. Thornburg, IE  
G. W. Reinmuth, IE  
K. V. Seyfrit, RIV  
R. E. Shewmaker, IE  
L. N. Underwood, IE  
(H11-002067-H06)

PDR (50-482)  
LPDR (50-482)  
IE Files (50-482)  
Central Files  
EDO Reading  
(EDO-7492)  
IE Reading

WPU: SM  
6/24/80  
Job Y

RCI: IE  
RESheemaker  
6/25/80

RCI: IE  
GWReinmuth  
6/25/80

RCI: IE  
H. D. Thornburg  
6/27/80

ELD  
J. P. Murray  
6/25/80

DD: IE  
RCDeYoung  
6/ /80

D: IE  
VStello  
6/ /80

# Kansas

## State Building and Construction Trades Council



Alan Thompson, President  
~~1231 Eugene~~ 1231 Eugene  
Topeka, Kansas  
913-233-4027

Olin Miles, Vice-Pres.  
606 Burton St.  
Wichita, Kansas  
316-264-3870

Jim DeHoff, Executive Secretary  
~~222 W. 9th~~ 222 W. 9th  
Lawrence, Kansas 66044  
913-843-3151

### FILE COPY

7/30/1979  
1231 Eugene St. P.O. Box  
Topeka, Ks. 66608

Elmer B Staats  
Controller General of the United States  
Washington, D.C. 20541

Mr. Elmer Staats,

Because of the Nuclear Regulatory Commissions past history of making decisions favorable to the utility, the Kansas State Building and Trades Council is disappointed but not surprised that the N.R.C. approved the concrete in the base mat at Wolf Creek Nuclear Generation Station near Burlington, Kansas. The N.R.C. approved the base mat concrete without a direct examination of that concrete as placed. The N.R.C. decision was based entirely on tests, examinations and analysis of "samples" of concrete made from the base mat test mix. The N.R.C. has not insisted that Kansas Gas & Electric examine the base mat concrete itself.

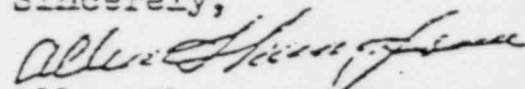
On April 10, 1978, less than a month after discovery of the low strength concrete, Bechtel Power Corporation, Architect Engineer for the Wolf Creek project, recommended that core drilling be done at 60 degree increments in the reactor base mat. Kansas Gas and Electric did not accept this recommendation and core drilling of the base mat was never done. The concrete base mat has never been strength tested, examined in a laboratory, or subjected to petrographic examination to determine its ingredients.

It is the view of the Kansas State Building and Trades Council that this questionable decision by N.R.C. has created a very serious situation therefore we demand a full investigation by the Government Accounting Office of N.R.C. activities, particularly in the Wolf Creek situation. We feel there should be a complete investigation of the N.R.C., especially Region IV in Arlington, Texas. We are also expecting our Congressmen to demand such an investigation.

The N.R.C. still does not know the reason for the low strength of the test cylinders at 90 days, nor do they know why the 90 day tests showed lower strength results than the 28 day tests. They are no nearer an answer now than they were on March 15, 1978, when N.R.C. was notified of the test results of the 90 day test cylinders. It appears they chose to go no further with the investigation and

are simply allowing the construction to continue. As concerned citizens of this state we are asking that action be taken on our behalf.

Sincerely,

A handwritten signature in cursive script, appearing to read "Allen Thompson".

Allen Thompson: President  
The Kansas State Building  
and Trades Council



# Kansas

## State Building and Construction Trades Council



Alex Thompson, President  
1231 Eugene  
Topeka, Kansas  
913-233-4027

Olin Miles, Vice-Pres.  
606 Burton St.  
Wichita, Kansas  
316-264-3870

Jim DeHoff, Executive Secretary  
222 W. 9th  
Lawrence, Kansas 66044  
913-843-3151

August 6, 1973

Joseph Hendrie, Chairman N.R.C.  
Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Hendrie,

The Kansas State Building Trades Council would like to request your assistance, with what we feel could be a very serious problem at the Wolf Creek, Nuclear Power station near Burlington, Kansas. We have enclosed a copy of the letter sent to the controller General of the United States, which is self explanatory.

We would appreciate any help your office could offer concerning this matter.

Thank you.

Sincerely,

Alex Thompson  
Alex Thompson  
President

Jim DeHoff  
Jim DeHoff  
Executive Secretary

7909250628

1p



UNITED STATES GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548

ENERGY AND MINERALS  
DIVISION

OCT 13 1979

Mr. Allen Thompson, President  
The Kansas State Building and  
Trades Council  
1231 Eugene St., P.O. Box 8129  
Topeka, Kansas 66608


Dear Mr. Thompson:

Thank you for your July 30, 1979, letter which requested our office to investigate the Nuclear Regulatory Commission, particularly its action with regard to the acceptability of the concrete base mat at the Wolf Creek nuclear powerplant. Your request has been referred to me for reply.

Since the Nuclear Regulatory Commission came into existence in January 1975, the General Accounting Office has issued over 30 reports on various Commission programs and operations. Last year, for instance, we completed a comprehensive study of the Commission's inspection program for nuclear powerplants under construction in which we concluded that the Commission has no independent basis to judge the adequacy of construction activities. We found that the Commission's inspection program was primarily a records review--as opposed to direct inspection--and relied heavily on the integrity of the utilities and their contractors to build the plant and to identify and correct construction defects. We recommended that the Commission expand its inspection activities both in terms of manpower and the type of inspection performed. A copy of that report is enclosed for your review.

In addition we have several reviews, either ongoing or planned, relating to Commission programs and activities. We, therefore, welcome your request and will consider it during the conduct of our audit activities.

As my staff has discussed with you, we have looked into the concrete base mat problem at the Wolf Creek nuclear powerplant. We have talked with and reviewed the files of the Nuclear Regulatory Commission and have gotten the verbal perspective of the problem from representatives of the Bechtel Power Corporation, the Kansas Gas and Electric Company, and the U.S. Corps of Engineers.



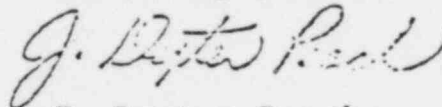
OCT 18 1979

Kansas Gas and Electric and its contractors have concluded--after further tests--that the concrete test cylinders are above the original 5000 pounds per square inch (psi) requirement and have some evidence to support that assertion. The Nuclear Regulatory Commission, however, has not accepted that evidence but has chosen to rely on the original cylinder tests which show that the concrete is 4460 psi instead of 5000 psi.

By taking this conservative approach, the Commission staff does not believe it is necessary to take core samples from the base mat, a procedure it feels might affect the integrity of the mat. Instead it has required Kansas Gas and Electric to reanalyze the powerplant design and determine if the base mat is still capable (with the lower strength concrete) of meeting the powerplant seismic, loading, and other requirements. Using what the Commission staff and Bechtel Power Corporation described as standard analytical procedures, the reanalysis showed that the strength of the concrete was not a critical factor in the acceptability of the base mat at the Wolf Creek site. It seems that the plant was designed to meet the seismic criteria for a number of sites and is well within the design parameters for the Wolf Creek site, even with the lower strength concrete.

I hope that this information will be of help to you and again express my thanks for your confidence in the work of the General Accounting Office.

Sincerely yours,



J. Dexter Peach  
Director

Enclosure

bc: Mr. McCullough, EMD (w/o enclosure)  
Mr. Howard, EMD (w/o enclosure)  
Mr. Myslewicz, EMD (w/o enclosure)  
Control Clerk, EMD (MC-79-537, MC-79-513 w/o enclosure)

HATCEER/krr 10/10/79