



THE ELECTRIC COMPANY

KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT-OPERATIONS

May 9, 1980

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 76012

Re: NRC Docket No. STN 50-482/Ppt. 80-05

Dear Mr. Seidle:

This letter is written in response to your letter of April 11, 1980 which transmitted Inspection Report 50-482/80-05. As requested, the finding is being addressed in four parts:

- a) Corrective steps which have been taken and the results achieved;
- b) Corrective steps which have been taken to avoid further noncompliance;
- c) The dates when full compliance will be achieved, and
- d) Plans to improve the effectiveness of the Management Control Program. .

Finding

On March 19, 1980, the IE Inspector found water standing on the floor of the storage area for reactor closure head and reactor upper and lower internals. The subject of storage of the reactor vessel closure head and upper and lower internals had been discussed with licensee representatives in April 1979 (Inspection Report STN 50-482/79-07) and was the subject of an item of noncompliance (Inspection Report STN 50-482/79-09). It is thus apparent that measures taken to make the walls and roof weather tight were inadequate and the continued presence of

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standing water in the storage area indicated that corrective action taken by management has not been prompt nor adequate to preclude recurrence of these conditions which are adverse to quality.

Response

- a) The existing storage building has been stiffened and the steams caulked in an effort to preclude the entry of water into the building. Drainage in and around the building has been improved. Even at the time of the NRC finding, the reactor internals and head were sitting on large timbers and were covered with plastic sheets and tarpaulins to eliminate deleterious effects of any water leaking into the building.

These efforts have not been effective in making the building completely water tight for an extended period of time, but have protected the internals and reactor vessel head from becoming wet or damaged.

- b) To avoid further problems with the storage building, it is being abandoned. The reactor internals are being moved inside the reactor building for storage in the refueling pool and the reactor vessel head will be moved into a new, more secure building being erected on the concrete slab used during fabrication of the containment building dome.
- c) Relocation of the reactor internals and head is expected to be accomplished by May 21, 1980.
- d) Over the past year, Daniel management took actions to improve the storage building. After several of these modifications, the building was observed after inclement weather conditions and appeared to be weather-tight. This is evidenced by the fact that following completion of corrective action after NRC Report 79-09 in July 1979, no further incidences of water occurred until October of 1979, at which time deficiencies recurred and further corrective action was taken. Upon completion of this corrective action in December 1979, a leak test was performed and no leakage was observed until March, 1980. During this period the building was observed after at least one overnight rain and was found dry, as documented on Surveillance Report 1189. NRC Report 80-05 references Surveillance Reports 674, 885 and 1189, which are dated 8/14/79, 10/02/79 and 01/23/80. It should be noted that these Surveillance

Mr. W.C. Seidle

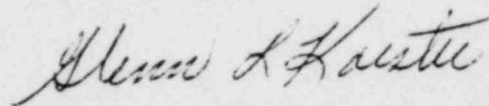
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Reports do not indicate any presence of water. To improve management control over storage conditions, a meeting of Daniel Managers was held at the construction site on April 30. During this meeting the Project Manager issued explicit instructions that Managers are to notify subordinates to assure that proper communication and corrective action channels remain open and that necessary corrections are implemented in a timely manner. Also, an overall review of storage requirements has been initiated to identify storage areas in need of improvement.

Please advise if you need additional information.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Glenn L. Kaestle".

GLK:bb