



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT-OPERATIONS

June 24, 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

KMLNRC-004

Ref: NRC Docket No. STN 50-482/Rpt. 80-08

Dear Mr. Seidle:

This letter is written in response to your letter of May 23, 1980, which transmitted Inspection Report 50-482/80-08. As requested the deviation is being addressed in three parts:

- a) Corrective steps which have been taken and the results achieved;
- b) Corrective steps which have been taken to avoid further noncompliance; and
- c) The date when full compliance will be achieved.

Finding

Cable tray for Wolf Creek is purchased via nonsafety-related Bechtel Specification 10466-E-034 as an off-the-shelf or "commercial grade item" as defined in 10CFR21. The IE Inspector was informed by Bechtel personnel on site and in Gaithersburg that the cable tray had been qualified for its intended use in the seismic supported raceway system of IE cables and, therefore, did not require the designation of "Q" or safety-related material. This was further substantiated to the IE Inspector when he reviewed a letter to the Executive Director, SNUPPS, from the Project Engineering Manager, Bechtel, dated August 20, 1979, subject IE Information Notice 79-14, related to 10CFR50, Appendix B requirements for cable tray.

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Qualification testing substantiates the functional use of "commercial grade item" in a safety-related application. The testing qualifies the material as safety-related quality; it does not preclude the designation as safety-related. The failure to designate the material as safety-related exempts it from QC and QA requirements and from the generic reportability requirements of 10CFR21 and 10CFR50.55(e).

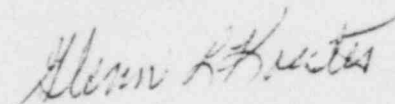
This is a deviation from FSAR commitments and has generic implications at all SNUPPS sites.

Response

- a) Our review of this finding confirms that indeed we have purchased cable tray as commercial grade material for all locations throughout the plant and such procurements have not been designated "Q". However, the design and installation of the Class IE cable tray system has been carried out in accordance with a QA Program. The supports for the cable tray have been purchased and installed as "Q" items. The Raceway Seismic Test Program conducted by our A/E has confirmed the structural adequacy of the commercial grade cable trays used at Wolf Creek.
- b) The existing quality control procedure for the installation of electrical raceway (QCP-X-300 Rev.4) Section 1.2 will be revised to clearly indicate the definition of installation. Section 1.2 shall read "Installation is defined to commence when the raceway is placed in the permanent position designated by the approved drawings." From the point in time of cable tray installation in a class IE location it has been treated as class IE and has been subject to QA and QC requirements including reporting of significant safety problems as set out under Part 21 and 10CFR50.55(e). This has been in effect and governed by Section 3.9 of (QCP-X-300).
- c) Procedure QCP-X-200 will be revised as indicated above by July 24, 1980.

Please advise if you need additional information.

Yours very truly,



GLK:bb