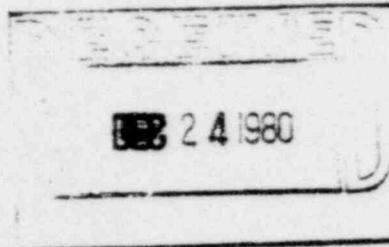




KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR



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 76011

Director, RCI, OIE
Director, AEOD
Chief, OEB, MPA
→ IE FILES

KMLNRC-047

Re: Docket No. STN 50-482

Subj: Work Hold Agreement #13

GLKoester letter dated 11/25/80 to WCSeidle

Dear Mr. Seidle:

Attached is a revised Corrective Action Program to be carried out by Daniel Construction in order to enhance the pipe cleanliness program. Also attached is a summary that identifies the changes we request from the November 25, 1980 program and the reason for requesting these changes. I believe you will find the same end result will be achieved with the new revised program compared to the program that was submitted to your office on November 25, 1980.

As stated earlier, Kansas Gas and Electric Company will notify your office prior to our lifting of the Work Hold Agreement No. 13 in order for Mr. Thomas Vandell to assure you that the corrective action plan as outlined in the attached revised plan to this letter has been put in place.

Would you please call me as soon as you have received this information as we would like to get this program underway immediately.

Sincerely,

Glenn L. Koester

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GLK:bb
Attach
cc: WCadman, w/a
ECreel, w/a
TVandell, w/a

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SUMMARY OF PROPOSED PROGRAM CHANGES FROM WORK HOLD
AGREEMENT #13 CORRECTIVE ACTION (Dated 11/25/80)

1. Change - Under Corrective Action, Paragraph A & B, the responsibility for pipe cleanliness has been assigned to craft personnel up to the stage of construction when the pipe spool is ready for fit up.
1. Reason for Change - The above change is made to focus responsibility on the craft personnel and to make more Quality Control personnel available at the time that assuring a pipe spool is clean really counts, just prior to fit up and tacking in place for welding.
2. Change - Under Corrective Action, Paragraph C, the only significant change is in Part 2 where a Construction Monitor who reports to the Construction Manager and independent from craft supervision has been set up in lieu of the independent group of craft personnel who reported in line to consecutive levels of craft foremen and craft supervision.
2. Reason for Change - The above change is to provide a mechanism where a qualified non-manual person will monitor the pipe cleanliness program prior to pipe fit up and be able to report any variations to the program directly to Senior Management.
3. Change - Under Corrective Action, Paragraph D, the Construction Monitor has been added to the list of personnel to be retrained in requirements of the new pipe cleanliness program and also the Foreman in lieu of the Independent Craft Monitors now will be required to go through an extensive training program to ensure they are fully cognizant of the cleaning requirements.
3. Reason for Change - The above change is made to concentrate the training on the piping foremen and craft persons that work with the pipe on a daily basis during all stages of piping construction and to emphasize to those persons their front line responsibilities in the pipe cleanliness program to ensure the pipe cleanliness requirements are met. The Construction Monitor will receive the same training as the piping foreman and craft persons to ensure a uniform complete understanding of the pipe cleanliness requirements.
4. Change - A list of the foreman's responsibilities has been added to this change. Foreman responsibilities with regard to pipe cleanliness are delineated to clearly define the foreman's responsibilities.
4. Reason for Change - The above addition is made to improve the pipe cleanliness program by clearly stating the foreman's responsibilities and is to ensure there can be no misunderstanding among, the foreman, crafts persons, supervision, Quality Control and the Construction Monitor on the foreman's responsibilities.

POOR ORIGINAL

5. Change - Deviations from CAR #5 and #6 Commitments
This list of the Deviations from CAR #5 and #5 Commitments had been attached to this change, however, they have been previously discussed in the Corrective Action paragraphs and are listed for ready reference.
5. Reason for Change - The above addition is made to readily identify the changes from the program that existed prior to November 25, 1980.

WORK HOLD AGREEMENT #13

In response to Work Hold Agreement #13 (issued November 20, 1980), Daniel International proposes the following corrective action to modify and upgrade the existing pipe cleanliness program as initially outlined in CAR #6.

CAUSE OF NONCONFORMING CONDITION

In evaluating the spools identified in Kansas Gas and Electric Surveillance Report No. S-280, it has been determined that:

- A) Pipe being processed through the Pipe Cleanliness Station (Hydrolaser Building) is effectively being cleaned, inspected, and capped.
- B) Cleaned pipe being stored in the staging area is adequately being stored and cleanliness including integrity of end caps is being maintained in these areas.
- C) The integrity of the pipe end caps is being maintained on the pipe once it has been brought into the buildings; however, the Quality Control Seals on the caps are not being maintained.
- D) Field personnel are not fully aware or cognizant of the existing requirement for having Quality Control witness the removal and replacement of end caps while the pipe is being worked in the buildings.
- E) Hard card portable listings of cleanliness requirements (as committed to in CAR #6) have been made, but due to the amount of information printed on the card and printer errors, they are difficult to read and therefore have not been issued to all involved personnel.
- F) Although placement of dams prior to end prep grinding or dirt-producing activities is being performed, there is evidence that the dams are not being used for 100% of the time or the sealing integrity of the dam is not always adequate.
- G) Work Procedures do not clearly explain the existing pipe cleanliness program.

CORRECTIVE ACTION

- A&B) The construction craft will have all responsibility for cleaning the pipe in the Pipe Cleaning Station, capping after cleaning, and maintain pipe cleanliness in the staging areas. Quality Control will not be required to verify cleanliness after cleaning, nor seal the caps in the Pipe Cleaning Station.
- C) Responsibility of maintaining pipe cleanliness once the pipe leaves the staging area and is brought into the building will be shifted directly to the construction craft responsible for installing the pipe as follows:
 - 1. The craft foreman installing the pipe will have the ultimate responsibility for insuring pipe cleanliness is maintained from the time he has it brought into the building until it is completely installed.
 - 2. A Construction Monitor, reporting to the Construction Manager independent from Craft Supervision will be set up. Specific responsibility will be to perform surveillance of craft responsibility of in-process cleanliness and cleanliness control. The Construction Manager will take corrective action on any reported deviation to the in-process cleanliness criteria.

POOR ORIGINAL

3. The craft foreman will be required to have the pipe inspected for cleanliness and released for fitup by Quality Control. This inspection will be performed after the pipe has been moved into approximate installation position, with sufficient accessibility for the Quality Control Inspector to adequately inspect the internals of the pipe.
 4. As part of the release for fitup, the installed pipe will also require inspection by Quality Control. Quality Control will have to witness the removal of the cap from the installed piece.
 5. If both the installed pipe and the pipe being installed are clean, the Quality Control Inspector will release the joint for fitup by indicating such on the appropriate form in the Traveler. If the piece being installed is not acceptable, it will be returned to the craft for cleaning. If the installed piece is not acceptable, a Deficiency Report will be initiated.
 6. After release for fitup, all open ends of the pipe not required for fitup will be capped and sealed by the Quality Control Inspector.
 7. If it is necessary to delay fitup and re-install the cap(s) after the pipe is released for fitup, Quality Control will be required to apply a seal to the cap(s). Removal and/or replacement of the sealed cap(s) will require witness by Quality Control.
 8. If it is necessary to do additional work on the pipe being installed prior to fitup, control of the pipe can be returned to the craft by having the Quality Control Inspector void his release for fitup on the Weld Control Record. Quality Control will be required to again inspect and release the pipe prior to fitup.
 9. All installed pipe and pipe released for fitup will be under control of Quality Control. A Quality Control Inspector will be required to witness removal of caps, installation and removal of dams, and replacement of caps, with the Quality Control Inspector verifying cleanliness at these times.
 10. For Non-Q pipe, Mechanical Engineering will perform the Quality Control functions specified in Numbers 2 through 8.
- D) All Craft, Engineering, Quality Control, and Construction Monitoring personnel involved with installation of piping will be re-trained in requirements of the new pipe cleanliness program. (Procedure revisions are addressed in (G), below.) Foremen will be required to go through an extensive training program to ensure they are fully cognizant of the cleanliness requirements. These training sessions shall be completed prior to starting work.
- E) "Hard Card" portable listings will be recorded and issued to Craft, Quality Control, and Engineering personnel. The cards will be revised, listing key information and shall be printed on a size sufficient to ensure legibility.
- F) Addressed in (C), above.
- G) Appropriate Work Procedures and Quality Control Procedures will be revised to reflect the above program. ICP's shall be issued prior to starting work. To supplement procedure requirements, Work Instructions shall be issued to craft foremen by the Construction Manager, outlining the following specific responsibilities of the foreman to assure compliance with the procedure. These Work Instructions shall be emphasized during training.

FOREMAN RESPONSIBILITIES:

1. To insure that integrity of caps is maintained and that caps are not removed from the pipe unless required to perform work.
2. To insure that dams are placed and adequately sealed: 1) prior to performing end preps or other dirt-producing activities; or 2) at any time caps will be left off for long periods of time.
3. To assure pipe is clean prior to removal of dams or replacement of caps.
4. To assure caps are replaced after completion of work.
5. To assure pipe is clean prior to requesting cleanliness inspection by Quality Control prior to fitup.

Effectiveness of the above program will be monitored through our existing Quality Assurance Program.

DEVIATIONS FROM CAR #5 AND #6 COMMITMENTS

As stated in the opening paragraph, the preceeding was a proposal to modify and upgrade the existing pipe cleanliness program. The commitments made in response to CAR #5 and #6 are to remain in effect, with the following deviations:

- A) Piping will not be inspected by Quality Control after cleaning in the Pipe Cleaning Station.
- B) "QC Accept" seals denoting cleanliness will not be applied to end caps until after the pipe is released for fitup.
- C) Quality Control will not be required to witness removal of caps, installation and removal of dams, or replacement of caps until after the pipe is released for fitup.
- D) Quality Control Inspectors will perform surveillance of pipe for condition of capping and sealing only on installed pipe or pipe released for fitup.