

## UNITED STATES

## NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 1000 ARLINGTON, TEXAS 76011

November 26, 1980

In Reply Refer To: RIV Docket No. STN 50-482

> Kansas Gas and Electric Company ATTN: Mr. Glenn L. Koester Vice President - Nuclear Post Office Box 208 Wichita, Kansas 67201

## Gentlemen:

This confirms our receipt of your letter to Mr. W. C. Seidle, dated November 25, 1980, concerning Work Hold Agreement No. 13, issued November 20, 1980. The Work Hold Agreement, applicable to final fitup, welding and bolting of safety-related piping, was issued to Daniel International for corrective action to be taken relative to pipe cleanliness conditions at the Wolf Creek Generating Station. Reactor coolant piping and small bore pipe fabrication under other cleanliness controls are excluded from the Work Hold Agreement.

Specifically, with regard to corrective actions that are to be taken prior to release of the Work Hold Agreement, we understand that:

- 1. Responsibility for maintaining pipe cleanliness after the pipe leaves the staging area and is brought into the building will be shifted to the construction craft responsible for installation of the pipe as follows:
  - a. The craft foreman will be responsible for assuring pipe cleanliness until just prior to fitup and for verifying cleanliness prior to requesting cleanliness inspection. The foreman will also be responsible for assuring that dams and seals are in place during weld preparation and other similar activities.
  - An independent group of craft personnel will monitor in-process cleanliness.
  - c. Quality control will inspect the pipe for cleanliness just prior to fitup after the pipe has been placed in position for installation.

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- d. After the pipe is erected and installed, quality control will verify cleanliness and seal all open ends of the pipe.
- e. If it is necessary to delay fitup and reinstall caps after the pipe is released for fitup, quality control will apply seals to the caps. Quality control will witness removal or replacement of sealed caps.
- f. If additional work on the pipe is necessary prior to fitup, control of the pipe will be returned to the craft by voiding of the release for fitup by quality control. Quality control will again inspect and release the pipe prior to fitup.
- All craft, engineering and quality control personnel involved with installation of piping will be retrained in the requirements of the new pipe cleanliness program prior to resumption of work.
- 3. "Hard Card" portable listings of cleanliness requirements will be issued to craft, quality control and engineering personnel. The cards will be revised to list key information and will be of sufficient size to assure legibility.
- All appropriate work and quality control procedures will be revised to implement the above program and will be issued prior to resumption of work.

We request that you inform this office sufficiently in advance of any plans that you have to resume work so that we may evaluate your pipe cleanliness program prior to release of the Work Hold Agreement.

If your understanding of this matter is inconsistent with the above, please contact this office immediately.

Sincerely

K. V. Seyfrii

Director