

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Report: STN 50-482/81-20

Docket: STN 50-482

Category A2

Licensee: Kansas Gas and Electric Company
P. O. Box 208
Wichita, Kansas 67201

Facility Name: Wolf Creek, Unit 1

Inspection At: Wolf Creek Site, Coffey County, Burlington, Kansas

Inspection Conducted: December 14-17, 1981

Inspector:

R. C. Stewart
R. C. Stewart, Reactor Inspector

01/20/82
Date

Approved:

W. A. Crossman
for W. A. Crossman, Chief, Reactor Projects Section 2

1/20/82
Date

Inspection Summary:

Inspection conducted during December 14-17, 1981 (Report STN 50-482/81-20)

Areas Inspected: Licensee action on previous inspection findings and site tour. The inspection involved 27 inspector-hours on site by one NRC inspector.

Results: No violations or deviations were identified.

DETAILS1. Persons ContactedPrincipal Licensee Personnel

- D. W. Pringel, QA Manager, Site
- *G. Reeves, Assistant QA Manager, Site
- D. Sayre, QA Technician
- *C. Parry, QA Supervisor

The NRC inspector also interviewed other contractor personnel during the course of the inspection.

*Denotes those present at the exit meeting.

2. Action on Previous Inspection Findings

(Closed) Unresolved Item (STN 50-482/80-13, paragraph 6): Certification of QC inspectors. During a previous inspection (80-13) regarding QC inspector certification, the RRI noted that there were inconsistencies in a large percentage of the "Documents of Certification" in the QC inspector's files in that the dates of qualification were chronologically earlier than the approval signatures by the Project QC Manager and the individuals who recommended that the QC inspectors be certified.

The reasons for these discrepancies could not be determined at the time of the NRC inspection, since the individual responsible for preparation of the "Documents of Certification" was on leave.

During this inspection, the NRC inspector discussed the matter with the cognizant KG&E representatives and conducted a document review of QC inspector certifications. It was determined that the previously observed discrepancy in document dates was a matter of difference in one day and considered to have been done unintentionally; furthermore, during the interim, the QC Department has been reorganized with new individuals and recertifications. In addition, the area of QC inspector certification was reviewed during an NRC inspection conducted September 28 - October 2, 1981.

This item is considered closed.

(Closed) Unresolved Item (STN 50-482/80-13, paragraph 17): Storage requirements for mechanical core structures. During a previous inspection (80-13), the RRI reviewed the Receiving and Maintenance Instructions (RMI) for the mechanical core structures (upper and lower internals). In reviewing the implementation of the RMI, the RRI observed

that the lower internals package was stored in a vertical position in the refueling canal of the Reactor Containment Building which was contrary to the RMI which stated that the lower internals were to be stored horizontal. Prior to the close of the NRC inspection period, the RMI was revised specifying the lower internals be stored as observed; however, during a discussion on this matter during the exit meeting, the Daniel Construction representative stated that Daniel Construction Company did not have the responsibility for storage inspections of reactor internals. This matter remained unresolved at the close of the NRC inspection. During this inspection, the NRC inspector observed that, several reorganizations have taken place since this matter was in question. In addition, the KG&E and Daniel Construction representatives indicated that the Daniel Procedure, QCP-I-01, Revision 10, dated September 9, 1980, "Receipt, Storage and Preservation of Safety-Related Material and Items," clearly delegates the areas of responsibility and is being implemented. This area was also reviewed during an NRC team inspection conducted September 28 - October 2, 1981.

This item is considered closed.

(Closed) Infraction (STN 50-482/80-14): Failure to follow procedures and instructions. During the placement of concrete for Containment Building Dome, lift No. OC281-W07, the RRI observed several reinforcing steel shear bars were either not secured with tie wire on one end or were not secured at all. Although the licensee initiated prompt corrective action in order to permit the placement of concrete to continue, the failure to adequately secure the shear ties was considered to be in noncompliance with 10 CFR 50 and a Notice of Violation was issued.

In written reply letter, dated September 4, 1980, the licensee stated that to prevent recurrence of the incident, retraining sessions have been scheduled for both Quality Control and Craft personnel. Retraining was to be completed by October 1, 1980.

During this inspection, the NRC inspector reviewed internal correspondence and Daniel Construction Company training records. Daniel Construction Company records reflect retraining of nine QC inspectors and eight craft personnel during the period August 10, 1980, to September 11, 1980.

This matter is considered closed.

(Closed) Infraction (STN 50-482/80-12): Failure to establish housekeeping zone designation. On June 6, 1980, the RRI (Acting) determined that a specific zone designation (Zone I, II, or III), in compliance with ANSI N45.2.3 and associated cleanliness requirements commensurate with the current construction activities, had not been assigned or implemented the construction activities and had not been assigned or implemented by the construction manager for the reactor refueling cavity in the Containment Building.

In a written reply letter, dated July 22, 1980, the licensee indicated that at the time of the observed infraction, the reactor vessel did not have the reactor internals installed and that the ANSI N45.2.3 Zone III requirements were not required. However, control of personnel entering the cavity and the prohibition against the entrance of food or tobacco as required by Zone III is appropriate. Accordingly, the area has been designated Zone IV with the additional provision for controlling personnel access. A security guard has been stationed at the entrance to the cavity so as to allow only entry. In addition, Daniel Procedure AP-XIII-05, "Project Housekeeping," will be revised to clearly establish the above controls.

During this inspection, the NRC inspector reviewed procedure AP-XIII-05 and interviewed the security guard at the cavity entrance verifying the implementation of controlled access.

This item is considered closed.

(Closed) Deviation (STN 50-482/80-12): Failure to fully comply with PSAR commitments in establishing a Fire Protection and Prevention Program.

During inspection activities performed by the NRC RRI (acting) for the period of June 1980, the RRI reviewed the on site Fire Protection and Prevention Program established by Daniel Construction Company. The following discrepancies were identified by the RRI:

- a. No provisions for fire fighting involving the use of an available community fire department have been made (as of June 10, 1980).
- b. Fire brigade training has been conducted, however, drilling of the fire brigade has not been done on a regular basis, as required by Daniel Procedure AP-XIII-03. In addition, the training attendance of the fire brigade members is not consistent. Fire brigade members are volunteers.
- c. The site fire brigade is formed only on the regular shift, 7:00 a.m. - 5:30 p.m., Monday through Thursday. The weekend shift or night shift does not have an assigned fire brigade.
- d. Site fire prevention instructions do not contain provisions for evacuation of confined areas.

In a written reply letter, dated July 22, 1980, the licensee stated that:

- a. The Burlington Fire Department has been contacted and their full support has been assured. In addition, the Daniel's

procedure for contacting the Burlington Fire Department will be incorporated into Procedure AP-XIII-03, "Construction Site Fire Prevention and Protection."

- b. Fire brigades have been established for each working shift, including night shifts and weekend shifts. Training and practice sessions are being conducted on a regular basis and in accordance with procedure AP-XIII-03.
- c. In addition to fire fighting instructions, evacuation procedures for personnel working in remote locations has been incorporated in procedure AP-XIII-03.

During this inspection, the NRC inspector reviewed Daniel Procedure AP-XIII-03, "Construction Site Fire Prevention and Protection" Revision 2, dated 8/4/81 and the associated documentation records verifying the corrective action as outlined in the KG&E letter dated July 22, 1980.

The NRC inspector had no further questions regarding this matter.

This item is considered closed.

(Closed) Infraction (STN 50-482/80-09): Improper storage of safety-related items. During a site tour during the period April 29 - May 2, 1980, the NRC inspector observed that during the tour of the Auxiliary Building, stainless steel spool pieces and fittings, including IEJ-01-S-010/112 and 11-EN-01-S008/112, were observed to be improperly stored. They were found standing in water and dirt, not on cribbing or otherwise protected from physical damage or environmental contamination. ANSI N45.2.2 specifies that items requiring "Level D" storage are to be stored on cribbing or equivalent to allow for air circulation and to avoid trapping water. This condition is in noncompliance with requirements of Appendix B, 10 CFR 50. The specific items identified during the tour were immediately corrected and stored properly.

In a written reply letter dated 6/24/80, the licensee stated that, in addition to reemphasizing the procedural requirements of Procedure WP-I-01 with personnel responsible for the incorrect storage of the material; storage and protection of piping will be audited by both KG&E and Daniel QA organizations for the next three months to verify compliance with project requirements.

During this inspection, the NRC inspector reviewed QA surveillance reports for the period June 1980 - August 1980. The NRC inspector had no further questions regarding this matter.

This item is considered closed.

(Closed) Infraction (STN 50-482/80-09): Damaged Concrete - Reactor Cavity and Transfer Canal.

a. Reactor Cavity Damaged Concrete

On April 29, 1980, during the observation of the spalled concrete in the reactor cavity, the IE inspector identified cracks in the concrete adjacent to the stainless steel refueling cavity seal ring. The damage apparently occurred during the vessel setting procedure and had not been reported to Quality Control Engineering.

b. Fuel Building Transfer Canal Concrete Damage

During a site tour conducted November 28, 1979, the IE inspector identified broken concrete in six separate areas around the Fuel Building fuel transfer canal in placement No. OC-611-S04. The damaged areas had not been identified to Quality Control or Engineering. This item had previously been considered an unresolved item.

In a written reply letter dated June 24, 1980, the licensee indicated that:

On April 29, 1980, DR #1SD-3855-C was initiated to identify and document the damaged concrete adjacent to the reactor cavity seal area. This DR was upgraded to NCR No. 1S-2015-C on 5/1/80 and sent to Bechtel to be evaluated and dispositioned. Bechtel has since dispositioned the NCR by specifying the repair procedure.

On 11/29/79 DR No. 1SD-2863-C was initiated to identify and document damaged concrete around the fuel building transfer canal. This DR was upgraded to NCR No. 1SN-1600-C on 1/10/80 and was forwarded to Bechtel to be evaluated and dispositioned. Bechtel has dispositioned the NRC by specifying the repair procedure. The work has been completed, inspected and approved by quality control.

In addition, by letter dated 6/12/80, Daniel's Project manager instructed his top managers to remind employees that Section 4.1.1 of procedure AP-VI-02 requires the reporting of nonconforming material and/or activities.

The licensee also indicated that "Gang Box" training sessions on the subject matter would be conducted.

During this inspection, the NRC inspector conducted a review QA/QC Documentation on this matter. Nineteen NCR's/ISN's were reviewed including NCR's no. 1SN-2015-C. In addition, the inspector reviewed Daniel Procedures AP-VI-02, "Nonconformances Control and Reporting," Revision 10, dated 3/2/81.

The NRC inspector had no further questions regarding this matter.

This item is considered closed.

(Closed) Infraction (STN 50-482/80-09): Change in acceptance criteria without procedural authorization.

During in-place relative density testing of the Ultimate Heat Sink (UHS) Dam, a change in the test acceptance criteria was initiated by the Level I Soils Inspector without procedural authorization. Specifically, the reference to Proctor Density Test No. LW-60 in Field Density Test No. LQ-222 was changed to Proctor Density Test No. LW-81 in Field Density Test No. LQ-223, which was a retest of No. LQ-222.

In a written reply, letter dated June 24, 1980, the licensee stated that:

On 4/9/80 during placement of soil on the ultimate heat sink dam density testing was performed as required by specification. During the testing a Soils Inspector noted a change in material from LW-60 to LW-81. He noted the change on his test record. The Resident Geotechnical Engineer agrees that from a technical standpoint the Inspector took the correct action.

In reviewing the procedure which controls soils testing (QCP-II-102) we find that the responsibilities for selection of which proctor test to use is not clearly delineated. Therefore, responsibility for the initial selection of a proctor and subsequent changes will be added to procedure QCP-II-102. Prior to issuance of the revised procedure the Lead QC Inspector (Soils) will review and approve all Proctor changes made by the Soil Inspectors.

A revised procedure will be in effect and full compliance will be achieved by August 1, 1980.

During this inspection, the NRC inspector verified the revisions to procedure QCP-II-102, "Backfill material selection, preparation placement and completion," Revision 8, dated July 23, 1980.

This matter is considered closed.

(Closed) Infraction (STN 50-482/80-09): Failure to provide a timely written report for a construction deficiency.

During an NRC inspection conducted during the period April 29 - May 2, 1980, it noted by the NRC inspector that KG&E did not provide a written report within 30 days concerning spalling of concrete in the reactor cavity which was initially reported as a construction deficiency (considered to be a reportable deficiency under 10CFR50.55(e) to the Region IV office on March 7, 1980. An interim report was issued on May 14, 1980.

In a written reply, letter dated June 24, 1980, the licensee stated that

- a. A review of our records indicates that we provided an initial verbal report to Mr. C. Oberg on March 7 regarding damaged concrete at elevation 2021'-7" adjacent to the reactor cavity which was considered to be a potential 50.55(e) item. We failed to get our record of this notification into our tracking system and therefore missed issuing a written report before April 7.
- b. When advised on May 9 by Mr. C. Oberg that a report was overdue, we proceeded to prepare the report which was sent to you on May 14. To prevent recurrence, we have checked with Mr. C. Oberg to be sure we are tracking all of the items which have been reported."

During this inspection, the NRC inspector observed that a final report was issued on this matter and correctly resolved in accordance with the requirements of 10CFR50.55(e).

In addition, the licensee is utilizing a computer print-out tracking system to prevent a recurrence of this type of oversight.

This item is considered closed.

3. Site Tour

The NRC inspector toured the reactor, auxiliary, and control buildings to observed construction in progress and to inspect overall housekeeping.

No violations or deviations were identified.

4. Exit Interview

The NRC inspector met with the licensee representatives (denoted in paragraph 1), on December 17, 1981, and summarized the scope and findings of the inspection.