



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

615 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

December 23, 1993

Docket: 50-482
License: NPF-42

Wolf Creek Nuclear Operating Corporation
ATTN: Neil S. Carns, President and
Chief Executive Officer
P.O. Box 411
Burlington, Kansas 66839

SUBJECT: NRC INSPECTION REPORT 50-482/93-21

Thank you for your letter of October 27, 1993, in response to our letter and Notice of Deviation dated October 4, 1993. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Deviation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel J. Collins".

Samuel J. Collins, Director
Division of Reactor Safety

cc:
Wolf Creek Nuclear Operating Corp.
ATTN: Otto Maynard, Vice President
Plant Operations
P.O. Box 411
Burlington, Kansas 66839

Shaw, Pittman, Potts & Trowbridge
ATTN: Jay Silberg, Esq.
2300 N Street, NW
Washington, D.C. 20037

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Wolf Creek Nuclear Operating
Corporation

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Public Service Commission
ATTN: C. John Renken
Policy & Federal Department
P.O. Box 300
Jefferson City, Missouri 65102

U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Wolf Creek Nuclear Operating Corp.
ATTN: Kevin J. Moles
Manager Regulatory Services
P.O. Box 411
Burlington, Kansas 66839

Kansas Corporation Commission
ATTN: Robert Elliot, Chief Engineer
Utilities Division
1500 SW Arrowhead Rd.
Topeka, Kansas 66604-4027

Office of the Governor
State of Kansas
Topeka, Kansas 66612

Attorney General
1st Floor - The Statehouse
Topeka, Kansas 66612

Chairman, Coffey County Commission
Coffey County Courthouse
Burlington, Kansas 66839-1798

Kansas Department of Health
and Environment
Bureau of Air Quality & Radiation
Control
ATTN: Gerald Allen, Public
Health Physicist
Division of Environment
Forbes Field Building 321
Topeka, Kansas 66620

Wolf Creek Nuclear Operating Corporation

-3-

Attachment: Licensee letter dated October 27, 1993

bcc w/attachment to DMB (IE01)

bcc w/attachment distrib. by RIV:

J. L. Milhoan	Resident Inspector
Section Chief (DRP/B)	DRSS-FIPS
Section Chief (RIII, DRP/3C)	RIV File
SRI, Callaway, RIII	MIS System
Lisa Shea, RM/ALF, MS: MNBB 4503	Project Engineer (DRP/B)
Section Chief (DRP/TSS)	P. Wagner

RIV:TL:DRS	DD:DRS	D:DRP	D:DRS	
PWagner <i>PW</i>	ATHowell <i>AT</i>	TPGwynn <i>TP</i>	SJCollins <i>SJ</i>	
12/23/93	12/23/93	12/23/93	12/23/93	

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Wolf Creek Nuclear Operating
Corporation

-3-

Attachment: Licensee letter dated October 27, 1993

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bcc w/attachment distrib. by RIV:

J. L. Milhoan

Section Chief (DRP/B)

Section Chief (RIII, DRP/3C)

SRI, Callaway, RIII

Lisa Shea, RM/ALF, MS: MNBB 4503

Section Chief (DRP/TSS)

Resident Inspector

DRSS-FIPS

RIV File

MIS System

Project Engineer (DRP/B)

P. Wagner

RIV:TL:DRS	DD:DRS	D:DRP	D:DRS	
PWagner <i>PW</i>	ATHowell <i>AT</i>	TPGwynn <i>TP</i>	SJCollins <i>SJ</i>	
12/23/93	12/23/93	12/23/93	12/23/93	

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Neil S. "Buzz" Carns
President and
Chief Executive Officer

October 27, 1993

WM 93-0143

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

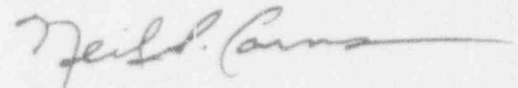
Reference: Letter dated October 4, 1993 from S. J. Collins,
NRC, to Neil S. Carns, WCNOG
Subject: Docket No. 50-482: Reply to Notice of Deviation
482/9321-04

Gentlemen:

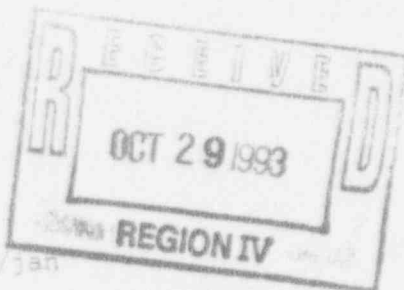
Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) "Reply to Notice of Deviation 482/9321-04" which was documented in the Reference (NRC Inspection Report 50-482/93-21). Deviation 482/9321-04 concerns the storage of quality assurance records in a site warehouse. The NRC stated that this condition, which was identified by WCNOG during a Quality Assurance Audit, was contrary to the Updated Safety Analysis Report commitment to maintain American National Standards Institute N45.2.9-1974 level storage of quality assurance records.

If you have any questions concerning this matter, please contact me at (316) 364-8831 ext. 4000 or Mr. K. J. Moles of my staff at ext. 4565.

Very truly yours,



Neil S. Carns
President and
Chief Executive Officer



NSC/jan

Attachment

cc: J. L. Milhoan (NRC), w/a
G. A. Pick (NRC), w/a
W. D. Reckley (NRC), w/a
L. A. Yandell (NRC), w/a

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94-0127

Reply to Notice of Deviation 482/9321-04

Deviation 482/9321-04: Deviation from Record Storage Commitment:
Untimely restoration to compliance with Updated Safety Analysis Report commitment to maintain American National Standards Institute N45.2.9-1974 storage of Quality Assurance records.

Findings:

Table 17.2-3, Sheet 2, of the Updated Safety Analysis Report commits the licensee to American National Standards Institute N45.2.9-1974, "Requirements For Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants." Section 5.6 of ANSI N45.2.9 requires protection of records from destruction by causes such as fire, flooding, tornadoes, insects, rodents, and from possible deterioration by a combination of extreme variations in temperature and humidity conditions.

Contrary to the above, on August 24, 1993, quality assurance records were being stored in a site warehouse that was not designed to withstand tornadoes and did not have adequate controls for temperature and humidity. This condition was identified by a licensee QA Audit conducted on May 12, 1993, and had existed since September 1992.

Reason for Deviation:

Wolf Creek Nuclear Operating Corporation (WCNOC) is committed by the Updated Safety Analysis Report (USAR), Table 17.2-3, Sheet 2, to maintaining Quality Assurance (QA) record storage in accordance with the requirements of American National Standards Institute (ANSI) N45.2.9-1974. The WCNOC record management system implementing procedures were written to this Standard. Many records were stored at the Americold storage facility in Kansas City, Missouri as there was insufficient qualified storage space on site for the records that were being retained.

The Americold facility suffered a major fire in late 1991. At that time, WCNOC had approximately 6,000 boxes of records stored at the facility. After the fire, Americold did not grant access to these records until September and October of 1992. It was then discovered that the records had been damaged by smoke, chemicals, and water. Because of the questionable integrity of the Americold facility, the records were subsequently returned to the Wolf Creek site.

Additional records had been accumulating on site from the time of the fire. Alternative ANSI storage options were under consideration, but there was no easy solution. With the return of the older, damaged records, Document Services was faced with a problem that had grown beyond that organization's resources to solve effectively. Some of the records returned from Americold were stored in the metal storage building at New Strawn, and eventually all were moved to that location. With the onsite

records vaults filled to capacity and a large number of QA records already in the New Strawn warehouse, some newer records were also moved to New Strawn.

During the ensuing months, Document Services focused on restoring and preserving the records and upgrading the storage conditions. Returning to full compliance with ANSI storage requirements was viewed as a long range goal. Certain radiographs from the construction phase, which are one-of-a-kind records, were of great concern. The film jackets and inner leaves were damp and had begun to mold. The leaves consequently could not be removed from the film without leaving paper fibers on the surface of the film, which in turn could result in darkening of the radiographs. These records were placed in new boxes and moved to an air conditioned room in the main warehouse. This action, completed on June 16, 1993, was necessary to prevent further degradation.

Reboxing of the remaining records from the Americold facility was completed on June 21, 1993. Modifications were made to the main warehouse for record storage and the remaining one-of-a-kind records moved there on July 29, 1993. As noted in the Reference, this does not meet ANSI storage requirements. However, as an interim measure, it provides a level of security (inside the Protected Area), fire protection, and protection from the elements not possible at the New Strawn warehouse.

The root cause for the extended period of non-compliance with the USAR commitment is the failure of both line and executive management to perceive the regulatory significance of the QA records storage issues. There are several contributing factors related to this matter.

Many records are currently retained which are not specifically required to be maintained as lifetime records. This conservative practice has resulted in the accumulation of a greater quantity of material than what can be effectively handled. In addition, for legal reasons the owner companies had historically prohibited the destruction of outdated records.

The personnel involved with this matter did not have the expertise or experience to deal effectively with a problem of this magnitude. Rather than formulating a decisive plan and pursuing executive management commitment of necessary resources, middle management attempted to resolve the problem within the resources of Document Services. The problem in fact could not be resolved promptly on a departmental level. The efforts expended to obtain information on restoration processes, develop options, and determine a course of action were necessary and did preserve the records. However, the time spent on these activities caused a delay in returning to compliance with the ANSI storage commitment.

Also contributing to the delay in resolving the issue was a perception of the personnel involved that executive management would be reluctant to commit the financial resources to fully correct the problem. Restoration cost estimates alone were in the hundreds of thousands of dollars.

Corrective Steps Taken and Results Achieved:

Some Non-QA Records have been removed from an ANSI records vault and additional shelving constructed. This action increased the records storage capacity on site. The radiographs previously stored at the Americold facility will be placed in qualified storage on site by November 30, 1993.

The comprehensive action plan developed by the Manager Document Services and the Vice President Nuclear Assurance during the inspection projected full compliance with USAR record storage commitments by May 31, 1994. A contract has since been entered into with the Record Center of Kansas City that will provide enough ANSI qualified capacity to store all required records. Records will soon be sent to that facility. The transfer of these records to the Record Center of Kansas City will be completed by December 31, 1993.

Corrective Steps That Will Be Taken to Avoid Further Violations:

Other parts of the action plan are ongoing. A comprehensive inventory of records in existing record vaults is being conducted. Those which have outlived their retention time or are not one-of-a-kind records will be removed from the vaults and either destroyed or stored in the warehouse as appropriate. This will allow more qualified storage space for those records that must meet ANSI level storage requirements. The scope of records requiring vault storage will be reduced through reclassification, reproduction, and reinterpretation of Code requirements. These efforts will be completed by May 31, 1994.

The new building under construction will house another QA records vault. This is expected to be complete in late 1994. The additional storage space, along with the reduction in volume of records requiring QA storage, will allow proper storage of all true QA records on site. This will give WCNOC control over the entire record retention process.

Date When Full Compliance Will Be Achieved:

With the transfer of QA records to the Record Center facility and the placement of the radiographs in ANSI qualified storage on site, full compliance with USAR record storage commitments will be achieved by December 31, 1993.

Actual or Potential Consequences of This Deviation:

Some records were damaged as a result of the Americold fire, and many records were subjected to increased potential for loss or deterioration during the above described period of evaluation and resolution. This deviation had the potential at least to hinder reconstruction and reevaluation processes in the future, such as for plant life extension. However, no records are known to have actually been lost or damaged beyond retrievability.