



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT, NUCLEAR

January 14, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

KMLNRC 83-004

Re: Docket No. STN 50-482

Subj: Draft Document EGG-EA-6109, Identification and Ranking of
Nuclear Plant Structures, Systems and Components and Graded
Quality Assurance Guidelines, dated November 1982.

Dear Mr. Denton:

We have reviewed the above referenced document with considerable concern. Some of these items are covered by the SNUPPS letter (SLNRC 83-001 dated 1/5/83 from NAPetrick, SNUPPS, to HRDenton, NRC); additional comments we would like to offer are as follows:

1. The document essentially expands the 10CFR50 Appendix B QA program to include the plant in its entirety. We feel that this is an unwise concept.
2. The QA program guidelines as described are very prescriptive and provide detailed guidance well beyond that required for effective Quality Assurance. This is in contradiction to the developmental guidelines of the document itself, which indicate a desire to "...develop an approach that would result in a program that was not toward the checklist end of the spectrum."
3. Historically, Quality Assurance was everyone's responsibility. Quality Construction, Operations, Engineering, and Maintenance was a healthy attitude which made everyone conscious of QA. Over the last 10 years there has been a subtle shift in the perception of QA by nuclear utility plant staffs, resulting in an attitude less conducive towards personal responsibility for Quality Assurance. We at Kansas Gas and Electric Company do not believe that shift in attitude has been a healthy one. Quality Assurance remains everyone's responsibility, and KG&E intends to continue to foster that attitude at our facility.

One of our major concerns regarding the proposed program is that it creates a situation which places Quality Assurance into a

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line function, thereby establishing a conflict of interest by requiring a single organizational group to participate in line function decisions, the results of which are then required to be audited by that same QA group. This gives QA a vested interest in the audit outcome, thus making it almost impossible for them to render a completely unbiased evaluation.

4. Cost Benefit. While KG&E has not conducted a cost benefit analysis, we feel that this document is indeed deserving of this analysis. While it is obvious that the costs of this program would be quite substantial, the benefits are not quite so obvious.

We believe a cost benefit study should be undertaken to show if any portion of this program would indeed be of benefit.

5. In addition to the financial costs of such an enormous program, the manpower costs must also be considered. As we are all aware in the nuclear industry, the supply of skilled personnel in any discipline is not unlimited, in fact shortages of personnel already exist in the industry's QA ranks. If we are forced to dilute our skilled QA ranks in order to expand QA into areas of limited or no safety significance, we believe that the areas now covered by QA may suffer.
6. The proposed expansion of the QA program may result in a weakening of traditional QA areas. The proposed program would also infringe on areas that are already covered by other programs which have historically proven to be effective. One specific area is the chartered functional responsibilities of the off-site safety review committee. Thus, these areas may not actually be strengthened, and could be degraded by injecting an organization, inexperienced in these areas, into a well-functioning system.
7. While not the intention of the document, the end result may be that QA assumes a prevalent role in plant operations, if this document is actually implemented. The establishment of a single entity with such broad control and responsibility is counter to the historically proven management principle of checks and balances as implemented in the nuclear industry. The uniquely successful safety record of the nuclear industry, compared to other industries, proves the truth of this statement. It appears imprudent to implement such a drastic change to organizational relationships which have been so successful.

In summary, Kansas Gas and Electric Company believes that such a radical change in NRC philosophy and utility organizations may not be justified by a cost benefit analysis. Nor would the overall safety of the plant or the

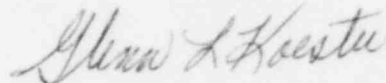
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general public be improved by implementing such a program. Furthermore, it is possible that the end result of the implementation of this program will be the assumption of primary responsibility for plant safety by the Nuclear Regulatory Commission staff, when it is supposed to rest with the Licensee. The plant operating agency must retain prime responsibility for plant safety.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

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cc: QA Committee
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