



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

December 23, 1982

Mr. W.C. Seidle, Chief  
Reactor Projects Branch 2  
U.S. Nuclear Regulatory Commission  
Region IV  
111 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

KMLNRC 82-262  
Re: Docket No. STN 50-482  
Subj: Response to Inspection Report STN 50-482/82-17

Dear Mr. Seidle:

This letter is written in response to your letter of November 24, 1982, which transmitted Inspection Report STN 50-482/82-17. As requested, the violation identified in the Inspection Report is being addressed in three parts:

- a) The corrective steps which have been taken and the results achieved;
- b) Corrective steps which will be taken to avoid further violations; and
- c) The date when full compliance will be achieved.

Violation: Failure to Provide Control of the Disassembly of Quality Accepted Pipe Supports.

Finding:

10CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, on October 21, 1982, the NRC Inspector found quality accepted hanger #AE04-H001/242 disassembled. Upon further review of the Daniel International Construction (DIC) procedures on

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safety-related pipe supports by the NRC Inspector, it was found that there is no approved procedure to control the disassembly of quality accepted pipe supports by craft. It was also found that QC has no means of knowing when to reinspect these quality accepted supports after the supports have been reassembled.

Response:

a) Corrective steps which have been taken and results achieved:

Nonconformance Report (NCR) #1SN 6817 P was written on October 21, 1982, describing the nonconformance for hanger #AE04-H001/242. Approval of Piping/Welding (P/W) disposition was completed on November 17, 1982 and a work copy is currently in the field traveler.

Interim Change to Procedure (ICP) #645 was approved and incorporated into Work Procedure WP-VII-208, Revision 11, on December 2, 1982. Paragraph 4.2.19 of the revised procedure specifies, "Note: If after a hanger has been quality accepted the need develops to disassemble or cut out a weld, work in accordance to Appendix X". Direction for controlling disassembly of quality accepted pipe supports and quality reinspection is contained in Appendix X, "Disassembly of quality accepted pipe supports".

Incorporation of ICP #645 allows for the rework and quality inspection of disassembled quality accepted pipe supports as specified for correction of the violation against 10CFR, Part 50, Appendix B, Criteria V.

b) Corrective steps which will be taken to avoid further violations:

Rework of hanger #AE04-H001/242 in accordance with #1SN 6817 P cannot be performed at this time because the pipe which the hanger supports will not be installed until after the flush of the feedwater (AE) system.

Quality accepted tags are being placed on all quality accepted hangers at this time. These tags will remain attached until the hanger is permanently painted. An ongoing program to paint quality accepted hangers is now in progress.

To stress the significance of hanger disassembly, a letter from the Daniel Construction Manager, CM #592, dated

December 7, 1982, to all Daniel personnel states, "Any dismantling of supports without proper documentation will be grounds for immediate termination."

c) Date when full compliance will be achieved:

Hanger #AE04-H001/242 will be reworked within (2) two weeks after KG&E's flush of the AE system. The scheduled turnover of this system is on January 7, 1983, but a flush date has not been established. However, NCR 6817 P will not be closed until rework is accomplished.

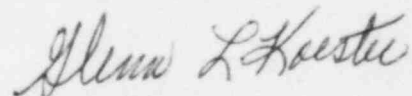
ICP #645 is marked for "automatic incorporation" into WP-VII-208. No further action is required by the P/W Department.

Painting of quality accepted hangers is an ongoing program, therefore, no date of completed action is required.

The quality department has committed to revising QCP-VII-204 R/2, by 2/15/83, to establish a "Quality acceptance tagging" program per, LSN 6818 P.

Please contact me or Mr. Otto Maynard of my staff if you have any questions concerning this response.

Yours very truly,



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cc: HRoberds/SSchum