#### APPENDIX

# U.S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection Report: 50-482/90-36 Operating License: NPF-42

Docket: 50-482

Licensee: Wolf Creek Nuclear Operating Corporation (WCNOC)

P.O. Box 411

Burlington, Kansas 66839

Facility Name: Wolf Creek Generating Station (WCGS)

Inspection At: WCGS, Burlington, Kansas

Inspection Conducted: December 3-7, 1990

Inspector:

R. C. Stewart, Reactor Inspector, Materials and Quality Programs Section, Division of Reactor Safety

Date /91

Approved:

I. Barnes, Chief, Materials and Quality Programs Section, Division of Reactor Safety 1/8/91 Date

Inspection Summary

Inspection Conducted December 3-7, 1990 (Report 50-482/90-36)

Areas Inspected: Routine, unannounced inspection of procedures and controls for implementation of 10 CFR Part 21 and followup on previously identified inspection findings.

Results: Within the areas inspected, no violations or deviations were identified. The licensee's procedures and controls for implementation of 10 CFR Part 21 requirements were found to be well defined and satisfactorily implemented.

#### DETAILS

### PERSONS CONTACTED

#### WCNOC

- \*B. D. Withers, President \*G. D. Boyer, Plant Manager
- \*J. A. Bailey, Vice President, Nuclear Operations
- \*M. G. Williams, Manager, Plant Support \*O. L. Maynard, Manager, Licensing
- \*C. E. Parry, Director, Site Quality
- \*S. Wideman, Licensing Specialist
- \*F. T. Rhodes, Vice President, Engineering and Technical Services
- \*R. Holloway, Manager, Maintenance
- \*E. W. Schntotzer, Manager, Purchasing and Material Services \*W. Goshora, Wolf Creek Coordinator
- \*J. Zell, Manager, Training
- \*J. Pippin, Manager, Nuclear Plant Engineering (NPE)
- \*C. Sprout, Section Manager, NPE
- \*W. Lindsay, Manager, Quality Assurance (QA)
- \*R. Benedict, Manager, Quality Control (QC)
- \*A. Payne, Manager, Supplier/Material Quality
- \*R. Flannigan, Manager, Nuclear Safety Engineering
- \*J. Weeks, Manager, Operations
- \*H. Chernoff, Supervisor, Licensina
- M. Megehee, Supervisor, Compliance

#### MRC

- L. Gundrum, Resident Inspector
- \*Denotes those personnel in attendance at the exit meeting held on December 7. 1990.

The inspector also contacted other members of the licensee's staff during the inspection.

- FOLLOWUP ON PREVIOUSLY IDENTIFIED INSPECTION FINDINGS (92701 AND 92702)
- 2.1 (Closed) Violation (482/9002-02): Identification on January 12, 1990, of a repeat condition adverse to quality pertaining to a chainfall being tied off to the fuel oil supply line of the "B" diesel generator. This condition, which potentially affected the operability of the diesel generator, was a repeat of a condition identified to the licensee on March 7, 1988.

A written internal Information Notice (IN-006) describing the correct use and storage of cranes/hoists was distributed to appropriate plant personnel on

March 23, 1990. Procedure ADM 01-110, "Housekeeping Control," requires periodic inspections to assure adequacy of housekeeping practices. The housekeeping record form was revised (Revision 8, October 31, 1990) to include a check for proper securing of hoist pull chains. In addition, the control room watchstation log and reading sheets have been revised to include the checking of hoist pull chains by operations personnel. This item is considered closed.

2.2 (Closed) Violation (482/8913-01): Inadequate corrective actions for assuring use of qualified welders. NRC Enforcement Action EA 87-213, issued March 17, 1988, cited the licensee in Example 6.c of Violation A for a welder performing a weld for which he was not qualified to perform. The licensee's response stated that corrective steps, which included qualification review by supervisors prior to assignment of welders, would be achieved by June 15, 1988. On March 24, 1989, the licensee identified, however, that a nonqualified welder had performed welding on a portion of safety-related piping in November 1988.

Upon identification of this oversight made by the designated supervisor, a letter dated March 24, 1989, was issued which required an independer\* verification of welder qualification be performed by welding engineering personner for all safety-related and special scope welding. This review verified the qualifications of all welders qualified to ASME Code requirements from the end of Refueling Outage II (January 5, 1988) to June 15, 1989. In addition, the licensee's welding engineering personnel performed a review of safety-related and special scope welding that had been performed by the nonqualified welder. A base metal repair on the essential service water line (ER-227+HBC-30") and two 4" butt welds in the steam generator blow down system (BM-140-EBD-4") were identified as having been performed by the nonqualified welder. The inspector noted that these welds were removed and replaced and documented on Work Request 01488-89, July 25, 1989, and Work Request 01506-89, March 17, 1990, respectively.

In order to avoid further violations, the licensee has revised Procedure ADM 08-302 to require welding engineering personnel to verify welder qualification by authorizing the field welding material requisition after the job assignment by the supervisor, but prior to the issuance of the weld filler material. Additional revisions were made to Quality Control (QC) Procedures, QCI 12.1-601, "Inspection of ASME/ANSI Welds," and QCI 12.1-602, "Inspection of AWS Welds," requiring the QC inspector to also verify that the welder is qualified to use the weld procedure specification as specified in the weld data sheet prior to the start of welding.

In view of the licensee's corrective actions taken, this item is considered closed.

2.3 (Closed) Unresolved Item (482/9008-02): Use of a 14-inch diameter ultrasonic calibration block during the inspection of the 4-inch diameter pipe side of Weld 1-AE-04-FW900.

In an interoffice letter, TS-90-0841, dated December 5, 1990, the licensee provided a detailed explanation of the calibration techniques and mock up used to demonstrate acceptable examination from both the pipe side and the weldolet

side, and that the use of the 14-inch diameter calibration block provided for proper ultrasonic examination. This item is considered closed.

2.4 (Closed) Inspector Followup Item (482/9012-01): Revision of Procedure WPSI-0000, "ASME/ANSI General Requirements," to provide additional criteria for post-weld cleanup activities.

During this inspection, the inspector verified that Procedures WPSI-0000 and VE-1, "Visual Examination of Welds," had been appropriately revised to clarify the requirements for completed welds. This item is considered closed.

2.5 (Closed) Unresolved Item (482/9012-02): Absence of verification of welding amperage during QC in-process welding surveillances. The licensee's QA manager committed to review the matter and implement appropriate corrective action.

During this inspection, the inspector verified that Procedure QCI 12.1-007, "Inspection of In-process Welding," Revision 2, incorporated a requirement for the QC inspector to verify that amperage is within the range specified on the welding procedure specification by use of a calibrated ammeter. This item is considered closed.

2.6 (Closed) Unresolved Item (482/9008-01): Nuclear Energy Services (NES) Procedure 80A9068, Revision 6, paragraph 7.2.8 did not appear to meet the closed book section requirements of SNT-TC-1A, for qualification of nondestructive examination (NDE) personnel.

In response to this item, the licensee pointed out that there was an apparent misunderstanding in that the absence of the words "closed book" in the specific examination paragraph of NES Procedure 80A9068, Revision 6, for Levels 1 and 11 NDE personnel was misleading. During this inspection, the inspector verified that paragraphs 8.2.1 and 8.2.2 of NES Procedure 80A9068, Revision 8, had been revised in order to clarify the matter. This item is considered closed.

## 3. 10 CFR PART 21 REVIEW (36100)

The objective of this area of the inspection was to determine whether the licensee has established and implemented procedures and controls, as required by 10 CFR Part 21, for ensuring the reporting of defects and noncompliances.

The following principal implementing procedures were reviewed by the inspector:

- KP-L2221, "Tracking and Evaluations of Reportable Defects or Noncompliances," Revision 2, dated June 11, 1990.
- ADM 01-033, "Instructions Describing Reportability, Review, and Documentation of Licensing Event Reports (LERs), and Deficiencies," Revision 21, dated March 14, 1990.
- KGP-1250, "Requisition and Procurement Process," Revision 5, dated November 26, 1990.

ADM 01-085, "10 CFR Posting Requirements," Revision 4, dated November 23, 1990.

The inspector observed that these procedures provided satisfactory instructions to all departments within the licensee's organization for reporting defects, evaluating deviations, informing the responsible officer, informing NRC, posting, specifying procurement requirements, and disposition of records. Procedure ADM 01-033 prescribes specific instructions for documenting events and/or defects and deficiencies. All station personnel are required to immediately report any defects/deficiencies to their immediate supervisor initiate a defect/deficiency report (Form 033-1) which is disseminated a delineated in the procedure.

The compliance department maintains a master log of all defect/deficiency reports and indicates those reports routed to the plant safety review committee (PSRC) for reportability review. In addition, the licensing department maintains a tracking and closeout log of all reported and potential reportable defects/deficiencies. The inspector selected seven defect/deficience reports from the licensing log that had been evaluated by the licensee and determined to be a nonreportable defect or condition. The inspector concurred with the licensee's conclusions. In addition, the inspector reviewed the master log of defects/deficiencies being maintained by the compliance department. The inspector noted that the licensee's selection of defect/deficiency reports for further evaluation by the PSRC for reportability appeared to be conservative.

The inspector selected two bulletin board locations listed in Procedure ADM 01-085 for verification of the posting requirements specified in 10 CFR Part 21. The two locations selected were the administration building and the security building access control. Both bulletin boards contained a copy of the Part 21 requirements, a copy of Section 206 of the Energy Reorganization Act of 1974, and a notice which stated where to examine the procedures applicable to 10 CFR Part 21.

No violations or deviations were identified.

## 4. EXIT INTERVIEW (30703)

An exit interview was held on December 7, 1990, at the conclusion of this inspection, with the personnel denoted in paragraph 1. At the exit interview, the inspector summarized the inspection findings. No information was presented to the inspector that was identified by the licensee as being proprietary.