

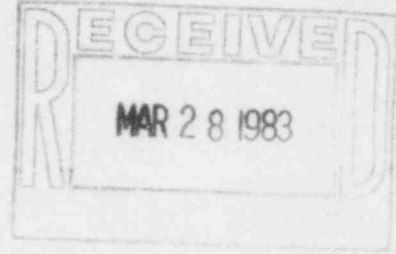


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

March 23, 1983

Mr. John T. Collins
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 83-033

Re: Docket No. STN 50-482

Ref: Letter of 3/11/83 from JTCollins, NRC,
Region IV, to GLKoester, KG&E

Dear Mr. Collins:

Your Referenced letter requested that Kansas Gas and Electric Company (KG&E) provide your office with specific questions that KG&E would like discussed during the meeting being held in Dallas, Texas, on April 5, 1983.

Attached are KG&E's questions as of this time. These questions were previously telecopied to your Mr. Hale.

Yours very truly,

Glenn L. Koester

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Attach

cc: HRoberts/SSchum, w/a

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QUESTIONS FOR APRIL 5 REGIONAL MEETING

A. Proposed Rule on License Conditions and Tech Specs in an Emergency

1. KG&E understands that the Commission received 25 comments concerning the proposed rule, two of which disagreed with the rule. On what basis were the comments disagreeing with the rule?
2. KG&E commented to the Commission that the rule as finally adopted should include those standards to be used by the NRC staff in evaluating a licensee's judgment and actions should the provisions of the rule ever be utilized. What are the NRC's plans with regard to the adoption of such standards?

B. QA Program Change Final Rule

1. Do changes to a utility's NRC approved QA program description for operations fall under the new regulations if the utility currently has only a construction permit and not an operating license? The operating QA program is being implemented by the Startup and Operations organizations in preparation for commercial operation.
2. Are submittals made per 50.54(a)(3)(ii) and 50.55(f)(3)(ii) intended to be a draft of proposed revisions for the SAR with the formal issuance of the revision to come after NRC approval?
3. What is intended by the 50.54(a)(3)(ii) and 50.55(f)(3)(ii) statement that the submittal must be accompanied by "...a forwarding letter identifying the basis for concluding that the revised program incorporating the change continues to satisfy the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC..." when the reason for this requirement, as stated in the last sentence of 50.54(a)(3) and 50.55(f)(3), is to obtain approval to reduce these previously accepted commitments?
4. How does 50.55(f) apply to subcontractors who have their own QA program which is neither described nor referenced in the plant FSAR?