



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

March 2, 1983



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

KMLNRC 83-019
Re: Docket No. STN 50-482
Subj: Wolf Creek Generating Station
System Turnover Quality
Action Plan

Dear Mr. Collins:

As discussed recently with you and your staff, Kansas Gas and Electric stopped turnover of safety-related systems at Wolf Creek Generating Station on February 21, 1983 due to potential deficiencies in the Wolf Creek quality programs. Since the date of the Stop Work Order, a plan of action to correct these deficiencies has been developed. Executive level management from both Daniel and KG&E have been involved in this planning. The objectives of the action plan are :

- (1) to assure that the Daniel process for system completion and turnover identifies, tracks, and resolves all discrepancies;
- (2) to assure that KG&E Startup receives and maintains an accurate status of systems turned over; and
- (3) to reinforce confidence in the quality of the Wolf Creek Project.

The purpose of this letter is to inform you of the actions that we are taking and the criteria that will be used to determine when we can lift the self-imposed Stop Work Order.

Actions that have been, or will be, taken by Daniel to improve the construction completion and system turnover process include:

- (1) proceduralization of several processes and modification of procedures to eliminate inconsistencies,
- (2) additional training for personnel involved with system turnover inspection and documentation,

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- (3) re-emphasis through meetings and training sessions of the importance of craft, engineering, and inspection personnel to produce a quality product, and
- (4) implementation of organizational and personnel changes that should improve quality.

A Task Force of senior KG&E and Daniel personnel recently completed a study of management aspects of the Daniel Quality Document Review Program. All of the Task Force recommendations will be given full consideration; several of the key recommendations will be implemented prior to lifting the Stop Work Order.

To assure that KG&E obtains an accurate status of systems to be turned over, an expanded pre-turnover verification effort will be implemented as follows:

- (1) Teams of KG&E Construction and Startup personnel will conduct a complete walkdown of all future safety-related systems. These complete walkdowns will continue until we have enough confidence that reduced verifications will be satisfactory. Documentation review will be expanded to include additional detailed review in those areas where documentation deficiencies have been experienced.
- (2) As a tool to monitor the effectiveness of the Daniel and KG&E turn-over verifications and reviews, KG&E Quality Assurance will perform a surveillance of each safety-related system after the formal system turnover.

Several safety-related systems have been turned over from Construction to KG&E Startup. For these systems or portions of systems which are safety-related, KG&E Construction and Startup personnel will perform complete system walkdowns and documentation reviews. In addition, KG&E Quality Assurance will perform a surveillance of each system after the joint Construction-Startup walkdown is complete.

In order to meet the overall objectives stated above, other actions will be taken as follows:

- (1) A complete evaluation of the BN01 Surveillance Report which first pointed out the turnover process deficiencies is nearing completion. Cause and corrective actions to prevent recurrence will be addressed in the evaluation.
- (2) Meetings for, and a letter to, all Wolf Creek personnel will emphasize the importance of achieving quality objectives and the dedication of both KG&E and Daniel to quality work.
- (3) A management assessment audit by an outside firm will be performed of both the Daniel Quality and the KG&E Quality Assurance organizations. This audit is intended to give us additional confidence in our quality programs and to seek areas of possible enhancements.

- (4) An individual from SNUPPS Staff has been assigned to assist me in insuring that the entire action plan is implemented.
- (5) As a related matter, the KG&E procedure for reporting 10 CFR 50.55 (e) deficiencies will be revised to clarify responsibilities.

The following are the criteria that will be used to determine when the Stop Work Order can be lifted:

- 1) Complete the implementation of the Daniel procedural, training, and organizational changes and the key recommendations of the Task Force on quality documentation.
- 2) Complete the revised turnover and verification process on a trial basis for a safety-related system.
- 3) Establish a schedule for the reverification of safety-related systems already turned over.
- 4) Complete the BN01 Surveillance Report evaluation and implement corrective action.
- 5) Issue a letter to all Wolf Creek personnel and conduct followup quality emphasis meetings by senior management personnel.
- 6) Establish a schedule for completion of the Daniel and KG&E Management assessment audits.
- 7) Implement the revised 10 CFR 50.55 (e) procedure.

I believe this covers all of the commitments discussed with your staff concerning this subject. We will keep your office and the Resident Startup/Operations Inspector informed of our progress.

If there are any questions or you need more information, please contact me.

Sincerely,



Glenn L. Koester

GK/jdp

cc: Richard C. DeYoung
Director of Inspection and Enforcement
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