

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-482/84-08

Construction Permit: CPPR-147

Docket: 50-482

Priority: A-2

Licensee: Kansas Gas and Electric Company
P.O. Box 208
Wichita, Kansas 67201

Facility Name: Wolf Creek Generating Station

Inspection At: Wolf Creek Site, Coffey County, Kansas

Inspection Conducted: April 9-13, 1984

Inspectors: *Wm McNeill* *4/26/84*
Wm. McNeill, Reactor Inspector, Project Section A,
Project Branch 2 Date

W R Bennett *4/25/84*
W. R. Bennett, Reactor Inspector, Special Projects
and Engineering Section Date

M Skow *4/25/84*
M. Skow, Reactor Inspector, Special Projects
and Engineering Section Date

Approved: *for* *W D Johnson* *5/1/84*
W. D. Johnson, Chief, Projects Section A
Project Branch 2 Date

R. Ireland *4/26/84*
R. Ireland, Chief, Special Projects and
Engineering Section Date

Inspection SummaryInspection Conducted April 9-13, 1984 (Report 50-482/84-08)

Areas Inspected: Routine, unannounced inspection of reactor coolant pressure boundary piping records. The inspection involved 90 inspector-hours onsite by three NRC inspectors.

Results: Within the one area inspected, three violations were identified (failure to properly review records, failure to identify nonconformances at turnover, and failure to update the system discrepancy list log following closeout of nonconformances, paragraph 2).

DETAILS

1. Persons ContactedKansas Gas and Electric Company (KG&E)

- *A. N. DiCesaro, Licensing
- *F. Duddy, Project Director
- *R. E. Gimple, Quality Engineering Supervisor
- *R. M. Grant, Director-Quality
- *W. M. Lindsay, QA Systems
- *V. Tuckert, Nuclear Plant Engineering
 - O. L. Maynard, Supervisor Licensing
- *J. G. Nelson, Project Quality Supervisor
- *C. Parry, Superintendent Quality Systems
- *W. J. Rudolph, Manager, QA
- *C. I. Steinert, QA Technician
- *S. J. Thibeaut, Document Review Supervisor
- *C. C. Warren, Superintendent Quality Evaluation

Daniel International Corporation (DIC)

- G. Bowers, Fabrication Supervisor
- L. Buckey, Materials Engineer
- *J. Fletcher, Project QA Engineer
 - D. Garrett, Quality Training Supervisor
- *J. Harvey, Project Manager
- *C. D. Mauldin, Acting Project Quality Manager
 - N. Rumold, CRG Supervisor
 - S. Sellman, CRG Welding Supervisor

Bechtel Power Corporation (Bechtel)

- *S. Sonchaiwanich, Engineer

Westinghouse Electric Corporation (Westinghouse)

- E. W. Hoack, Site Mechanical Engineer

The NRC inspectors also contacted other site personnel including administrative, clerical, construction, and inspection personnel.

*Denotes those attending the exit interview. The NRC senior resident inspector also attended this meeting.

2. Reactor Coolant Pressure Boundary Piping Record Review

The purpose of this inspection was to review a sample of reactor coolant pressure boundary piping records to determine whether:

- a. The DIC system for preparing, reviewing, and maintaining records is functioning properly;
- b. The selected records reflect work accomplished consistent with NRC requirements and SAR commitments; and
- c. The records indicate any potentially generic problems, management control inadequacies or other weaknesses that could have safety significance.

The NRC inspectors selected a sample of spools, valves, and welds; the records of these sample components and welds were then reviewed. In addition, the DIC procedures on record controls were reviewed to establish the programmatic requirements. In this regard, the following procedures were reviewed:

- . Quality Processing of QA Records, QCP-I-05, Revision 17
- . Records and Filing, AP-IX-04, Revision 11
- . Indoctrination Training and Certification of Quality Personnel, AP-VI-01, Revision 15
- . Nonconformance Control and Reporting, AP-VI-02, Revision 21

The nonconformance reports associated with the sampled hardware and software were inspected as well as the internal auditing of the records activity. The components selected were: three Spools EP-01-S004, EJ-04-S016, and BG-22-S001; four valves, Tag numbered BB8948A, 1200ZGM 88SEHOD000 W750004 (no tag number), BB8085, and BBV047; and the associated field welds for the above spools and valves.

Each spool was found to have a data package and these typically included the following types of records:

- . DIC Receiving QA Inspection Report and Checklist
- . Bechtel Surveillance Report Packing List
- . Vendor Certificate of Conformance
- . ASME Code Forms (NPP-1)
- . NDE Reports
- . Spool Sheets
- . CMTRs for Materials Used

Each Westinghouse valve was found to have a data package, and these typically included the following types of records:

- . DIC Receiving QC Inspection Report and Checklist
- . Westinghouse Quality Release
- . ASME Code Forms (NPV-1)

The Borg Warner valve was found to have a data package and this included the following types of records:

- . DIC Receiving QC Inspection Report and Checklist
- . Bechtel Surveillance Report Drawings
- . ASME Code Forms (NPV-1)
- . CMTRs for Materials Used
- . NDE Reports
- . Certificates of Conformance on Wall Thickness, Traceability and Cleanliness

The NRC inspectors reviewed these records and verified the compliance to procedures and the SAR requirements. In this respect, design documents of Bechtel and Westinghouse were also reviewed. These documents were 10466-M-201A, 10466-M-240, and Engineering Specification 952851 (when departures from the SAR were identified). It was found that these records were reviewed by DIC to "Desk Top Instructions" such as DRI-CRG-R-0, Revision 6, "Procurement CRG Review Inspection." These DIC reviews were documented on checklists. The personnel performing the reviews were qualified by DIC to perform such tasks.

In the course of this document review, one violation was noted. It was found that the ASME Code forms did not agree with the CMTRs in regard to the applicable material specifications. DIC documented this problem after identification by the NRC inspectors on NCR-1SN-17097P. This is a violation (482/8408-01).

In addition, during the review of CMTRs from Curtis Wright, it was noted that a preprinted form was used for Material Specifications SA-312 and SA-376. The specification levels for phosphorous for SA-376 differs from SA-312 (.03 max versus .04 max). If a reviewer used the limits on the preprinted form, out-of-specification material could be accepted for SA-376. This is unresolved pending additional record review (482/8408-04).

The qualification records of seven personnel were verified to comply with the established procedure. The field welding of the above spools and valves was documented on welding travelers, and these were reviewed. The qualification of five welders and four welding inspectors were verified in this regard. Records supported the applicable qualifications of the personnel in question. In review of the data packages and travelers, seven different nonconformances were identified, these were:

NCR 1SN-1151M
 1SN-1154M
 1SN-14504P
 1SN-1476MR
 1SN-480ZP
 DR 1SD-1839
 SDL EJ-151

It was verified that the sample of nonconformance reports (NCR), deficiency reports (DR) and system discrepancy list (SDL) were properly processed in accordance with procedures with the exceptions noted as violations. It was found that the System Discrepancy List no. EJ-151 was not listed on the turnover exception list prior to turnover. This is a violation (482/8408-02). Further review of SDLs and the turnover exception list revealed that the SDL logs were not updated properly, and this was identified as a violation (482/8408-03). In addition, an unresolved item was identified in regard to the turnover exception list. It was observed that startup engineers were initialing each line item to indicate approval of the category assigned. In several instances in the primary reactor coolant piping BB system, it was noted that the category assignment had been changed with no additional initials for the change or lineout. There was not a second set of initials which would ensure that the startup engineer was the person making the change to the category assignment and did, in fact, approve the change of category assignment. (482/8408-05).

The NRC inspector reviewed the QA audit schedule of October 1983 thru March 1984. Quality Assurance Reports, the audit reports, numbered QAR 95 and 102 were reviewed. The regulatory criteria log was also reviewed. In particular, the audits of welder qualifications was reviewed. It was found that audits were being performed as scheduled along with supplemental surveillance in accordance with established procedures. It was found that audit findings were properly addressed, followed up and corrective action was verified by QA auditors.

3. Records Allegation

An allegation has been made that records at Wolf Creek were improperly reviewed and controlled. In particular the concerns centered on lack of availability of QA manuals, failure to follow procedures, lack of qualification and training of personnel, lack of QA audits of record review, and lack of quality or illegibility of records. In the course of the inspection it was noted that QA manuals were general management tools and that necessary instructions or procedures were found at the reviewers work stations and as such were called "Desk Top Instructions." The qualification and training of personnel was in accordance with established procedures and appeared adequate. QA audits were performed of records, and these audits appeared to be adequate. Of the records sampled, legibility and quality also appeared adequate. The violation in regard to failure to properly review records does question the adequacy of some of the review activities and supports the allegation in that part on failure to follow procedures. The problem noted indicates that additional review, after document turnover is necessary to completely address this allegation.

4. Independent Inspection Effort

A verbal 10 CFR 50.55(e) report was made by KG&E in regard to Westinghouse DS-416 circuit breakers having no seismic positioner plates. This problem was first observed at Callaway. In addition, at Callaway, it has been reported that black colored control wiring was found instead of the red Exane-type that should be installed. It was verified by the NRC inspector that Wolf Creek reactor trip breakers had red Exane-type control wiring and no seismic positioner plates.

5. Unresolved Items

An unresolved item is a matter about which more information is required in order to determine whether or not the subject is acceptable or a violation. Two unresolved items are discussed in this report as indicated below:

Paragraph	Subject
2	CMTRs with Incorrect Specification Limits
2	Documentation of Category Changes on the Turnover Exception List

6. Exit Interview

An exit interview was held on April 13, 1984, with those personnel denoted in paragraph 1 of this report. At this meeting, the scope of the inspection and the findings were summarized.