KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER
VICE PRESIDENT - NUCLEAR

September 27, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

KMLNRC 84-171
Re: Docket No. STN 50-482
Subj: Changes to FSAR Description of Quality Assurance Program

Gentlemen:

10CFR50.55 requires that after March 11, 1983, each Construction Permit holder may change a previously accepted Quality Assurance Program description included in the Final Safety Analysis Report, provided the change does not reduce the commitments in the program previously accepted by the NRC.

Transmitted herewith are changed pages to the Wolf Creek operating Quality program described in the Wolf Creek Final Safety Analysis Report. The attached material also describes for these changes 1) the reason for the change and 2) the basis for concluding that the change does not reduce the KG&E commitments in the operating Quality program previously accepted by the NRC.

This information will be formally incorporated into the next revision of the Wolf Creek Final Safety Analysis Report. The information is hereby incorporated into the Wolf Creek Generating Station, Unit No. 1, Operating License Application.

Yours very truly,

Glenn L. Koester

GLK:bb
Attach
xc:POConnor, w/a
HBundy, w/a

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ADD: QAB, CY

OATH OF AFFIRMATION

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

I, Glenn L. Koester, of lawful age, being duly sworn upon oath, do depose, state and affirm that I am Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal, know the contents thereof, and that all statements contained therein are true.

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:

By Glenn L. Koester
Glenn L. Koester
Vice President - Nuclear

E.D. Prothro, Assistant Secretary

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

BE IT REMEMBERED that on this 27th day of September, 1984, before me, Evelyn L. Fry, a Notary, personally appeared Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on behalf of and as the act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the date and year above written.

Evelyn L. Fry
Evelyn L. Fry, Notary

EVELYN L. FRY
NOTARY
PUBLIC
STATE OF KANSAS

My Commission expires on August 15, 1985.

Revisions to the Final Safety Analysis Report Addendum and the reasons for the revisions are shown on a number basis next to the modified text. The numbers correspond to the reasons given below.

1. Reason for Change

   This change incorporates a response to an NRC question into the text.

   Basis for Concluding that the Revised Program Satisfies 10CFR 50, Appendix B

   No program change has been made with regard to this text change.

2. Reason for Change

   This change is editorial and clears up a potential ambiguity in the text.

   Basis for Concluding that the Revised Program Satisfies 10CFR50, Appendix B

   The text has been modified to more clearly describe the Wolf Creek Program. No program changes have been made with regard to this text change.

3. Reason for Change

   This change deletes potentially misleading and/or confusing text.

   Basis for Concluding that the Revised Program Satisfies 10CFR50, Appendix B

   The text has been modified to more clearly describe the Wolf Creek Program. The program has not been revised with regard to this text change.

4. Reason for Change

   This change revises the text to more correctly reflect how letters of intent are used.

Basis for Concluding that the Revised Program Satisfies 10CFR50,Appendix B

This change does not reduce the KG&E commitments in the Operating Quality Program. The previous commitment addressed how quality and technical requirements were assured if a supplier proceeded with work based on a letter of intent. It is KG&E's policy that no activities shall begin until an approved purchase order or contract is executed. Therefore, the quality and technical requirements are assured by the purchase order and contract procedures.

5. Reason for Change

This change modifies the text to be consistent with portions of the FSAR which were previously revised.

Basis for Concluding that the Revised Program Satisfies 10CFR50, Appendix B

No program change has been made with regard to this text change.

6. Reason for Change

The means of tracking welders versus welds made has been revised.

Basis for Concluding that the Revised Program Satisfies 10CFR50, Appendix B

In accordance with KG&E procedures, when a welder peforms a weld or weld repair under the KG&E Section XI program, his unique identification number is documented. This documentation provides traceability of work back to the actual weld.

7. Reason for Change

This section has been rewritten to clarify the relationship between hardware deficiencies (nonconformances - NCRs) and procedural/programatic deficiencies not related to an item (corrective actions).

Basis for Concluding that the Revised Program Satisfies 10CFR50, Appendix B

This revision is consistent with Criterion XV of 10CFR50, Appendix B, whose objective is to ensure that materials, parts and components that do not conform to requirements are controlled (i.e., identified, documented, segregated, dispositioned and made known to affected organizations).

This revision clarifies that the WCGS nonconformance program is used to control conditions directly affecting the acceptability of hardware and its associated documentation.

Problems not directly affecting hardware or its associated documentation such as program/procedural deviations are addressed in accordance with Section 17.2.16 which meets the requirements of Criterion XVI.

8. Reason for Change

This change clarifies who is responsible for QA records storage at WCGS.

Basis for Concluding that the Revised Program Satisfies 10CFR50, Appendix B

The organizations responsible for the Administration of QA records have been revised.

9. Reason for Change

The Director Nuclear Operations position has been filled.

Basis for Concluding that the Revised Program Satisfies 10CFR50, Appendix B

No program change has been made.

17.2.1.4.2 Manager Quality Assurance (Home Office)

The Manager Quality Assurance (Home Office), who reports to the Director Quality, devotes full attention to QA matters. He is responsible for verifying that an adequate QA program is developed and implemented for safety-related activities which occur at the corporate office and other locations remote from the WCGS. He maintains a staff and provides them with technical and administrative direction. He is responsible for establishing and implementing a comprehensive audit program for offsite activities of KG&E, and KG&E's suppliers, consultants, and agents. He coordinates quality verification activities with other KG&E departments and with external QA organizations. His qualifications are at a minimum equivalent to those of an Audit Team Leader as set forth in KG&E's procedures. (1)

17.2.1.4.2a Superintendent Quality Control

The Superintendent Quality Control who reports to the Director Quality devotes full attention to QC matters. He is responsible for the conduct of operating quality control activities and personnel at WCGS. (1)

17.2.1.4.3 Stop Work Authority

The Director Quality is authorized by the Vice President - Nuclear to stop work on ongoing quality activities which do not comply with established requirements. For onsite activities, this authority is delegated to the Manager Quality Assurance (WCGS) by the Director Quality. During the operating phase, these personnel have the authority to stop unsatisfactory work during repair, maintenance, and refueling activities and the authority to recommend to the Plant Manager stop work affecting the continuation of plant operation. Other stop work authority evolving from hold points, witness points, and mandatory reviews and approval will be delineated in procedures. The continuation of an activity which would preclude identification and correction or increase the extent of the deficiency is subject to stop-work action by the Quality Branch.

with new regulatory requirements. Design changes are defined to mean 1) planned changes in the basic plant design which modify the plant response, general design criteria, and specification requirements; and 2) the substitution of equivalent hardware or the substitution of nonsafety-related parts or components into safety-related components or systems. Changes in the WCGS basic design shall be aimed at improving safety, performance, maintainability, reliability, or inspectability. An engineering evaluation assures that these changes are consistent with the performance requirements specified in existing design documents.

Requests for design changes affecting safety-related structures, systems, and components shall be processed through the Configuration Control Board.

Procedures shall specify requirements for the review and approval of design changes by the organizations that performed the original design, if appropriate. Design activities may be delegated to others provided they have access to background and technical information. Design changes shall be communicated to appropriate plant personnel when such changes may affect the performance of their duties. | (3)

17.2.3.8 Design Review Committees

Independent of the responsibilities of the design organization, the requirements of the Plant Safety Review Committee (PSRC) and the Nuclear Safety Review Committee (NSRC) as specified in the Administrative Controls Section of the Technical Specifications, shall be satisfied. Design changes other than relating to fuel design which involve a modification or a creation of basic design criteria require a safety evaluation and review, and concurrence by the PSRC. | (2)
Design changes not relating to fuel which involve the substitution of hardware require a safety evaluation by the PSRC and approval by the Plant Manager; however, those changes which involve an unreviewed safety question or change in Technical Specifications also require a review and concurrence by the NSRC. When design other than fuel design is performed by an outside organization, the Manager Nuclear Plant Engineering shall perform or coordinate a review for operability, maintainability, inspectability, SAR commitment compatability, and design requirements imposed by plant equipment. In addition, the Manager Nuclear Plant Engineering shall identify and control design interfaces and coordinate the design process between internal divisions and the outside organization(s). | (2)

When required, safety analyses which consider the effect of the design as described in the design documents may be performed by KG&E or outside organizations. These analyses shall provide the basis for the PSRC safety evaluations which are

performed to determine that design changes do not involve an unreviewed safety question. Approved safety analyses or names of outside organizations performing the analyses shall be submitted to the PSRC. The safety analyses for design changes involving the substitution of hardware shall assure that the changes are consistent with and do not alter the performance requirements specified in existing design documents. The engineering approval of design documents and safety analyses prepared by outside organizations shall be by the outside organization unless otherwise specified. (10)

The PSRC shall perform safety evaluations and review design changes to determine whether or not they involve a change in Technical Specifications. The PSRC shall review design documents as necessary to recommend final approval of design criteria, identify unreviewed safety questions, or identify needed changes to Technical Specifications. Proposed changes to Technical Specifications shall be forwarded to the NSRC for review and approval pursuant to 10 CFR 50. The NSRC shall review appropriate material to verify that proposed modifications do not in fact involve an unreviewed safety question.

Completed design changes and test results shall be reviewed by the PSRC. Records shall be maintained which reflect current design, including safety analyses, safety evaluations, design change installation procedures, material identification documents, procurement documents, special process documents, equipment and installation specifications, and as-built drawings.

17.2.4.6 Purchase Requisitions

Purchase Requisition forms shall be used to initiate the procurement of safety-related materials, parts, components and services. Procurements shall be initiated by Wolf Creek staff, Nuclear Plant Engineering, Nuclear Services, or Quality Branch personnel.

Purchase Requisitions shall include or invoke specifications, bills of material, drawings, catalog number, full description, or item identification as applicable. Commercial items shall rely on proven design and utilize verification methods by the purchaser in lieu of supplier controls.

Purchase Requisitions for safety-related materials, parts, components, or services shall be reviewed by engineering personnel (WCGS staff engineers, Nuclear Plant Engineering or Nuclear Services) and Quality Branch personnel as detailed in the applicable procedures to verify that adequate technical and quality requirements, respectively have been specified, unless the procurement is a duplicate order invoking identical technical and quality requirements which have previously been reviewed and approved. The reviews for technical and quality requirements shall be by someone other than the originator of the requisition.

17.2.4.7 Letters of Intent

Letters of Intent may be utilized with suppliers of materials, parts, components, and services for the purpose of reserving schedule space prior to the resolution of the requirements to be included in a purchase order or contract. However, no activities shall begin until an approved purchase order or contract is executed. Letters of Intent shall be issued by the Purchasing Department. (4)

17.2.4.8 Purchase Orders and Contracts

Purchase Orders and Contracts are prepared and issued by the Purchasing Department, and establish for the vendors the technical and quality requirements which must be met. These documents also establish the commercial conditions (cost, schedule, warranty, insurance, etc.) for the procurement action.

The acceptance of services is very much a function of the service performed and may or may not involve Quality Branch personnel. For example, if the service is for NDE, the Quality Branch personnel will witness/inspect a portion of the work as it is being performed, and will review the inspection reports prepared and turned over to KG&E as the basis for acceptance. If the service is for engineering work the acceptance will be performed by KG&E engineering organizations based on their review of the design output documents produced. If the service is in support of the Quality Branch, such as audit work, the acceptance will be based on a review of the audit report(s) produced. The review will be made by KG&E Quality Branch personnel.

17.2.7.11 Final Acceptance

Final acceptance of items shall be by Quality Branch personnel. The final acceptance of services shall be the responsibility of the originating organization. Acceptance shall be documented.

17.2.7.12 Record Retention

Regarding the control of purchased material, equipment, and services, record retention shall be the responsibility of the Records Management organization. Specified inspection, test, and other records shall be available at the plant prior to installation or use.

be maintained on items, or records traceable to items, as required, through fabrication, erection, and installation. When unique traceability is impractical, bulk traceability may be employed, consistent with the relative importance of the item to safety.

17.2.8.4 Verification of Controls

Verification of correct identification and control shall be performed by the various involved organizations following item acceptance during surveillance of storage, assembly, and installation activities. The verification of identification during assembly and installation shall be by independent inspection within the involved organization. Verification of correct identification following receiving inspection shall be performed during the act of retrieval and release from storage. Physical identification or marking shall not affect the function or quality of the item being identified.

17.2.8.5 Nonconformance Control

In the event the identification or traceability of an item is lost, it shall be handled as nonconforming in accordance with Section 17.2.15.

17.2.10 INSPECTION

17.2.10.1 Scope

A program for the inspection of safety-related activities at the WCGS shall be established and executed to verify conformance with applicable documented instructions, procedures, drawings, and specifications. Inspections and process monitoring which serve an inspection function shall be performed by personnel qualified to perform assigned inspection tasks and who are other than the individuals who performed the activity.

17.2.10.2 Procedural Control

The inspection program shall be conducted in accordance with written approved procedures which specify inspection scope; personnel qualification requirements; inspection method description, including any mandatory holdpoints; acceptance criteria; data collection requirements; and documentation approval requirements. Inspection requirements may be obtained from drawings, instructions, specifications, codes, standards, or regulatory requirements.

Inspecting and the monitoring processes shall be performed by qualified personnel in accordance with instructions or procedures. Inspection procedures shall be employed to direct detailed inspection activities. Procedures which specify inspection activities shall be reviewed by the Quality Branch to verify the inclusion of independent inspection or process monitoring when required and to assure the identification of inspection personnel and the documentation of inspection results. KG&E inspection procedures will be reviewed by the Quality Branch. (15)

Instructions, procedures, and supporting documents shall be provided to inspection personnel as applicable for use prior to performing inspection activities. Inspection results shall be documented. Procedures shall prescribe the review and approval authority for inspection results.

Inspection procedures, instructions, or checklists shall provide, as required, for the following:

1. Identifying characteristics and activities to be inspected
2. Describing the method of inspection
3. Identifying the individuals or groups responsible for performing the inspection operation

4. Acceptance and rejection criteria

5. Identifying required procedures, drawings and specifications, and revisions

6. Recording inspector or data recorder and the results of the inspection operation

7. Specifying necessary measuring and test equipment, including accuracy requirements.

8. Evaluation of the inspection results and the person performing the evaluation.

17.2.10.3 Process Monitoring

Process monitoring of work activities, equipment, and personnel shall be utilized as a control if inspection of processed items is impossible or disadvantageous. Both inspection and process monitoring shall be provided when control is inadequate without both. A suitable level of confidence in structures, systems, or components on which maintenance or modifications have been performed may be attained by inspection. As appropriate, an augmented inspection program shall be implemented until such time as a suitable level of performance has been demonstrated.

Process monitoring of ongoing activities at the WCGS shall be at intervals based on the status and safety importance of the activities. Guidelines shall be established to indicate the minimum frequency of process monitoring for each ongoing activity and to provide a basis for subsequent monitoring planning.

The monitoring of processes shall be performed to verify that quality affecting activities are being performed in accordance with documented instructions, procedures, drawings, and specification.

17.2.10.4 Inservice Inspection

Required inservice inspection or process monitoring of structures, systems, or components shall be planned and executed. Inspection methods shall be established and executed to verify that the characteristics of an item continue to remain within specified limits.

The Manager Nuclear Plant Engineering shall be responsible for assuring the development of a preservice and inservice (PSI/ISI) inspection program, procedures and reference preservice and inservice examination plans; the updating of the reference plans to reflect as-built conditions, the technical requirements of the applicable code edition and addenda and the securing of inspection and consulting services. The Plant Manager shall direct the performance of the inservice inspection of pumps and valves as described in 17.2.11. (2)

17.2.14 INSPECTION, TEST, AND OPERATING STATUS

17.2.14.1 Scope

Safety-related and special scope items that are received, stored, or installed at the WCGS shall be identified and controlled in accordance with documented procedures.

17.2.14.2 Item Status Identification

Items received at or installed in the plant shall be identified in accordance with procedures as to their inspection, test, and operating status. Procedures shall control the application and removal of inspection and welding stamps and status indicators such as segregation, tags, markings, labels, and stamps. In the event traceability is not available or lost, the item(s) shall be considered nonconforming and handled in accordance with Section 17.2.15.

Placement and removal of tags used to define the boundaries of systems or components turned over to the Startup organization are the responsibility of the Startup Manager. Tagging used to control nonconforming items found during the Startup phase is also the responsibility of the Startup Manager.

Placement and removal of safety tags on installed equipment which has been turned over to Startup or Operations are the responsibility of the Operations Shift Supervisors. These tags are used to prevent operation of equipment, protect workers and to protect plant equipment from damage.

Placement and removal of tags to identify and control uninstalled, nonconforming items or materials subsequent to turnover from construction are the responsibility of the Quality Branch. Items segregated and placed in quarantine are the responsibility of the plant organization.

Certified welders will be assigned welder identification numbers by the Mechanical Supervisor. The identification number of welders making welds in compliance with the ASME code or on safety-related items will be documented. (C)

17.2.14.3 Operating Status

Plant procedures shall provide instructions relating to the operational status of safety-related structures, systems, and components, including temporary modifications. Those procedures shall address: Authorization for requesting that equipment be removed from service; checks which must be made before approving the request; approval of the action to remove the equipment from service; the actions necessary to isolate the equipment and responsibility for performing these actions; the actions necessary to return the equipment to its operating status and responsibility for these actions. Equipment and

17.2.15 NONCONFORMING MATERIAL, PARTS, OR COMPONENTS

17.2.15.1 Scope

Nonconformances are any deficiency in characteristics, documentation, or procedure which renders the quality of an item unacceptable or indeterminate. Nonconformances, therefore, include material deficiencies, malfunctioning or inoperative structures, systems and components, and departures from specified procedural requirements which impact the quality of an item. Nonconforming activities which have not resulted in hardware nonconformances (i.e., programatic or procedural deficiencies which do not impact the quality of an item), are corrected in accordance with Chapter 17.2.16, Corrective Action.

17.2.15.2 Nonconformance Controls

Nonconformances identified under the KG&E Quality Program shall be identified, documented, controlled, dispositioned and corrected in accordance with approved procedures. These measures shall provide for the notification of affected parties and controls to prevent the inadvertent use of nonconforming items.

Nonconformances shall be controlled by report documentation, tagging, marking, logging, or physical segregation. Nonconformances shall be documented on records which identify the nonconformance, record the disposition, and register the signature of an appropriate approval authority. Nonconformances shall be reworked, rejected, repaired, or accepted. Repaired and reworked items shall be reinspected in accordance with the original inspection and test requirements or approved alternatives. Reinspection results and operational data, gathered subsequent to repair or rework, are documented on nonconformance or inspection documentation.

Measures shall be established to control the conditional release of nonconformances for which correction is pending and a technical evaluation indicates that further installation, testing, and/or operation will not adversely affect nor preclude identification and correction of the nonconformance. A conditional release to proceed with testing or operation of a system or subsystem with outstanding nonconformances will consider the nature of the nonconformance, its effect on testing or operation, and the need for supplemental tests or inspections after correction of the nonconformance. These evaluations shall consider whether operation of the nonconforming item constitutes an unreviewed safety question. Conditional release evaluations shall be documented.

(7)

17.2.15.3 Reporting Methods

Nonconformance Reports, Work Requests, and Deficient Documemt Notices shall be employed to document nonconformances.

Nonconformance Reports shall be used to document nonconforming materials, parts, or components which require review and disposition by the responsible design authority. Nonconformance Reports may also be used to document nonconformances which do not require review and disposition by the responsible design authority.

Work Requests may be used to document nonconforming materials, parts, or components for which the disposition does not require design authority approval.

Deficient Document Notices shall be used to document minor documentation-related nonconformances which are identified at time of receipt inspection.

17.2.15.4 Disposition

Procedures shall prescribe the individuals or groups assigned the responsibility and authority to approve the disposition of nonconformances. Nonconformance disposition categories are:

1. "Rework" - reestablish compliance with applicable requirements.

2. "Reject" - replace with an item which meets the requirements.

3. "Repair" - after responsible engineering authority approval.

4. "Use-as-is" - upon responsible engineering authority approval.

"Repair" and "Use-as-is" dispositions shall be approved by the responsible design authority as prescribed in procedures. This authority shall be an organization which has demonstrated competence in the specific area, has an adequate understanding of the requirements and has access to pertinent background information.

Prior to implementation, dispositions shall be independently reviewed by the Quality Branch.

17.2.15.5 Procurement Controls

Plant and other KG&E organization procedures shall prescribe measures for the control and disposition of KG&E purchased

items which are identified by outside organizations as nonconforming. Procurement documents specify those nonconformances which shall be submitted to KG&E for approval of the recommended disposition. Actions taken in response to these nonconformances shall require documentation and shall be forwarded to KG&E along with the hardware and accompanying quality verification documentation. Nuclear Plant Engineering shall approve the recommended disposition of nonconformances relating to KG&E initiated procurement requirements. The Quality Branch staff shall be responsible for assuring the processing of these supplier-recommended dispositions. The disposition of a nonconformance which involves the design requirements shall be treated as a design change and, therefore, approved by the responsible design authority.

17.2.15.6 Reportable Nonconformances

Nonconformances shall be evaluated for reportability to the NRC under 10 CFR 21. All nonconformances identified as reportable shall be reviewed by the PSRC and NSRC.

17.2.15.7 Trend Analysis

Nonconformance documentation shall be analyzed by Quality Branch personnel for identification of potential unsatisfactory quality trends. The results of these analyses shall be reported to management. Significant adverse quality trends shall be handled in accordance with Section 17.2.16.

17.2.16 CORRECTIVE ACTION

17.2.16.1 Scope

Corrective action control measures shall be established to assure that conditions adverse to quality are promptly identified, reported, and corrected to preclude recurrence. Corrective action is necessary to correct omissions and problems in the operating Quality program. Corrective actions associated with the resolution of hardware related NCRs, audit, and programatic/procedural findings are processed in accordance with Sections 17.2.15 and 17.2.18, respectively. (7)

Significant conditions adverse to quality which impede the implementation or reduce the effectiveness of the program shall be controlled by the measures described herein. These conditions shall be reported to appropriate management, evaluated, and corrected. Significant adverse conditions may include an isolated gross noncompliance with procedural requirements, a recurring condition for which past corrective action has been ineffective, significant adverse nonconformance trends, or significant operating Quality program deficiencies.

17.2.16.2 Corrective Action Request (CAR)

Procedures shall provide instructions for identifying, reporting, and initiating corrective action to preclude recurrence of significant adverse conditions. A Corrective Action Request (CAR) shall be employed to document significant adverse conditions and to initiate the corrective actions for these conditions except in those instances when 10CFR21 reports, 10CFR50.55(e) reports or similar regulation required reports are prepared.

CARs shall be initiated by the Quality Branch. CARs are transmitted to the responsible KG&E manager. The manager shall identify the cause(s) of the deficiency, specify the action(s) necessary to correct the condition(s) and prevent recurrence, and provide or initiate the corrective action.

The appropriate engineering organization shall review significant conditions adverse to quality which involve design deficiencies or recommended corrective actions which require design change. In such cases the appropriate engineering organization shall be responsible for cause identification and recommending corrective action. (2)

17.2.17 QUALITY ASSURANCE RECORDS

17.2.17.1 Scope

A records system governing the collection, storage, and maintenance of records shall be established by KG&E and shall be in compliance with the standards and Regulatory Guides identified in Table 17.2-3. At a minimum, the records system shall apply to operating phase records associated with operating Quality program governed activities when records are required to either demonstrate compliance with licensing commitment or finished documentary evidence of the quality of items and activities affecting quality. All such records shall be considered QA records and shall be legible, complete, adequately identifiable to the item or activity involved and readily retrievable.

Quality Assurance records include but are not limited to operating logs; maintenance and modification procedures and inspection results; reportable occurrences; results of monitoring and reviews; inspections, tests, audits, and material analyses; qualification of personnel, procedures, and equipment; records required by Technical Specifications; and other documentation including drawings, specifications, procurement documents, nonconformance documentation, corrective action requests, procedures, and calibration procedures and reports required to demonstrate compliance with license commitments.

17.2.17.2 Responsibilities

A records system shall be established by the plant and other KG&E organizations and shall be controlled in accordance with written procedures. Implementing procedures shall address records administration; receipt of records; storage, preservation, and safekeeping of records; record retrieval; and the disposition of records in accordance with requirements identified in Table 17.2-3. The Manager Management Systems is responsible for assuring the handling and maintenance of Quality Assurance records generated, received, and stored at the home office. The Plant Manager shall provide for the administration of the Quality Assurance records stored in the QA Records Room at the WCGS. The Manager Management Systems shall provide for the administration of the Construction Records Vault at the WCGS. The Quality Branch shall audit the home office and the WCGS Quality Assurance record storage systems to verify their effectiveness. (8)

17.2.17.3 Records Index

The requirements for records administration shall specify that Quality Assurance records be listed in an index. The index shall be established prior to the receipt of records and shall indicate the location of records. Distributing and handling

KEY

___ ADMINISTRATIVE DIRECTION

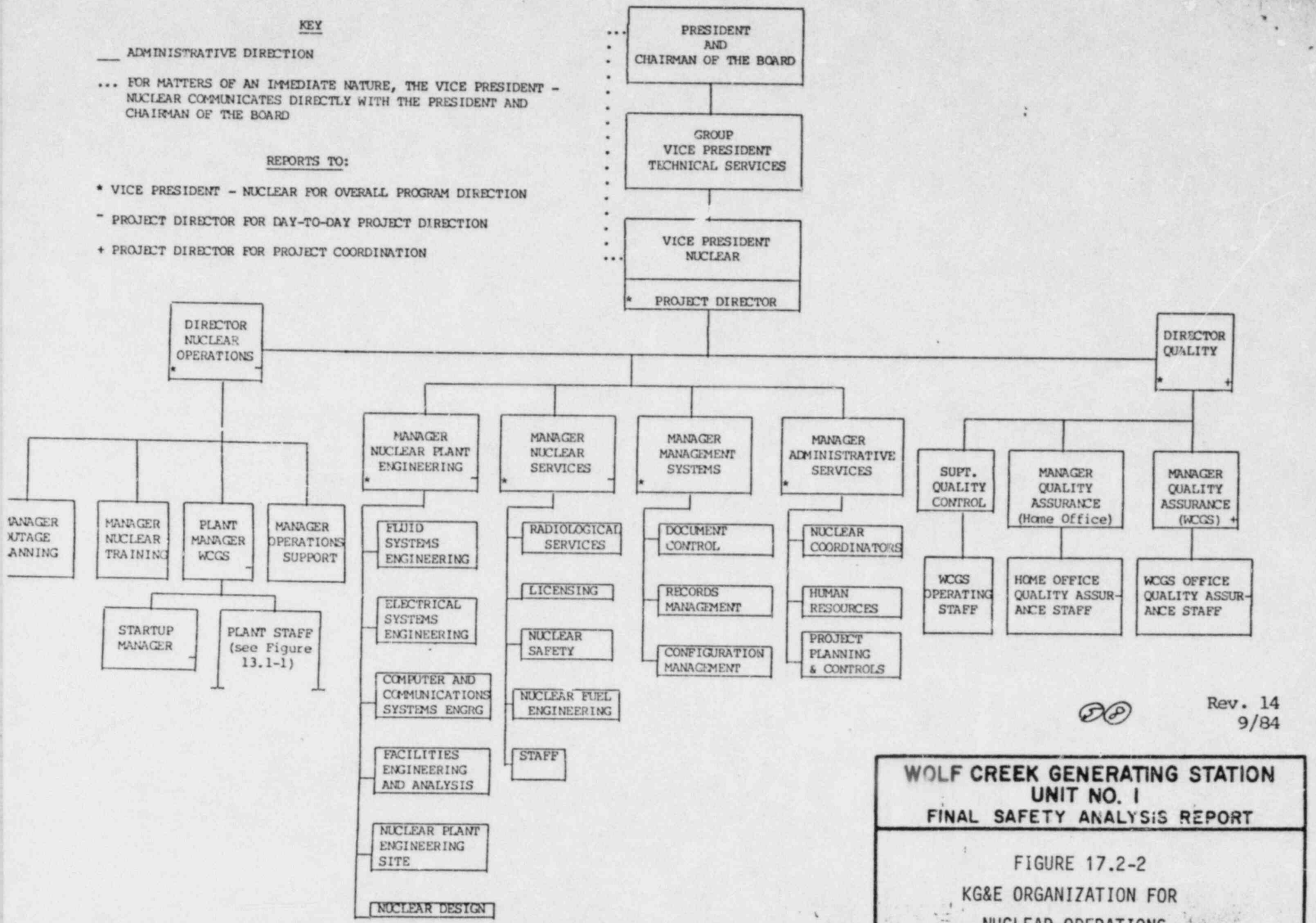
... FOR MATTERS OF AN IMMEDIATE NATURE, THE VICE PRESIDENT - NUCLEAR COMMUNICATES DIRECTLY WITH THE PRESIDENT AND CHAIRMAN OF THE BOARD

REPORTS TO:

* VICE PRESIDENT - NUCLEAR FOR OVERALL PROGRAM DIRECTION

- PROJECT DIRECTOR FOR DAY-TO-DAY PROJECT DIRECTION

+ PROJECT DIRECTOR FOR PROJECT COORDINATION



Rev. 14
9/84

WOLF CREEK GENERATING STATION
UNIT NO. 1
FINAL SAFETY ANALYSIS REPORT

FIGURE 17.2-2
KG&E ORGANIZATION FOR
NUCLEAR OPERATIONS