

Certified By J. Brangan 1/21/84

NOTICE OF VIOLATION
AND PROPOSED IMPOSITION OF CIVIL PENALTY

Kansas Gas and Electric Company
Wolf Creek Generating Station

Docket: 50-482/84-22
Permit: CPPR-147
EA 84-107

As a result of an NRC inspection conducted during the period of June 11, 1984 through September 28, 1984, two violations were identified one of which represents a significant breakdown in the licensee's program for the inspection and correction of defective safety-related structural steel welds. To emphasize the need for Kansas Gas and Electric Company management to ensure an effective quality inspection program has been implemented that both identifies and corrects construction deficiencies, the Nuclear Regulatory Commission proposes to impose a civil penalty in the amount of Seventy-five Thousand Dollars (\$75,000) for this violation.

In accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, as revised, 49 FR 8583 (March 8, 1984), and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended ("Act"), 42 U.S.C. 2282, PL 96-295 and 10 CFR 2.205, the particular violations and the associated civil penalty is set forth in Section I below:

I. Civil Penalty Violation

Criterion X of 10 CFR Part 50, Appendix B, requires that a program for inspection of activities affecting quality be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

Criterion XVI of Appendix B further requires that measures be established to assure that nonconformances are promptly identified and corrected.

Criterion XVII requires that sufficient records be maintained to furnish evidence of activities affecting quality.

Daniel International Corporation (DIC) Construction Procedure No. QCP-VII-200 describes the requirements for performance and inspection of safety-related structural steel welds with respect to committed conformance to the American Welding Society (AWS) D1.1-75. Appendix I in Revision 4 of this procedure invokes a prohibition with respect to lack of fusion, overlap, slag, arc strikes, and weld splatter. Paragraph 6.5.1 of AWS D1.1-75 requires inspector verification that the size and length of welds conform to the drawing requirements and that no specified welds are omitted.

Contrary to the above, the inspection program for safety-related structural steel welds was not adequately executed to assure conformance to the requirements of Construction Procedure QCP-VII-200 Revision 4 and the AWS D1.1-75 Code nor were adequate records kept to document the quality of the welds. Furthermore, once deficient welds were identified, no actions were taken to correct the deficiencies. This inadequate inspection program and the failure to take corrective actions is evidenced by the following:

1. A random reinspection of 241 structural steel safety-related welds, which were made in accordance with Revision 4 of QCP-VII-200, was performed by DIC and documented in Corrective Action Report (CAR) No. 1-W-0029 dated March 22, 1983. Sixty-two percent of the inspected welds were found by the DIC inspectors to not conform to the requirements of Revision 4 of QCP-VII-200. The reported defects that resulted in rejection by the DIC inspectors included arc strikes, slag, lack of fusion, overlap, and weld splatter.
2. Another reinspection of a sample of structural members with the lowest design safety margins was initiated on September 14, 1984. The results of the licensee reinspection activities (verified by NRC inspectors) as of September 28, 1984, were as follows:
 - a. A missing weld was found at the same location in each of six pressurizer support connections. In addition, five of 14 fillet welds in one pressurizer support connection were undersized by 1/8-inch to 1/4-inch with respect to the drawing-required size of 5/8-inch, and two of these welds were also under the required length; i.e., 3-inch and 5-inch lengths, respectively, versus a drawing-required length of 8 inches. The weld dimensions of the remaining five pressurizer support connections were not included in the NRC verification activity.
 - b. Reinspection of nine structural steel connections in the auxiliary building identified two missing welds in one connection. In addition, weld size and length discrepancies were identified in each of the nine connections. Of the total of 106 welds in the connections, eight were found to be undersized by 1/16-inch to 3/16-inch with respect to drawing-required width. Two of the undersized welds were also under the required length; i.e., 2 1/4-inch and 2 1/2-inch lengths, respectively, versus a drawing required length of 3 inches. An additional nine welds were also under the drawing-required length of 3 inches by 1/2-inch to 1-inch. Examination of 54 weld returns in the nine connections found 26 to be undersized by 1/16-inch to 3/16-inch with respect to drawing-required widths. One of the undersized weld returns was also under the required length; i.e., 2 inches versus a drawing-required size of 3 inches. In addition, 36 weld returns exceeded the drawing-required maximum length of 5/8-inch by 1 5/8 inches to 3 5/8 inches. An additional eight weld returns exceeded the drawing-required maximum length of 3/4-inch by 1/2-inch to 2 1/8 inches.
3. The absence of required Miscellaneous Structural Steel Weld Records (MSSWRs) for documenting welding and inspection of safety-related structural steel welded connections was identified by KG&E in CAR No. 1-C-0031. As a result of this identification, it has been established that approximately 16 percent of MSSWRs could not be located, which precludes positive verification of control of welding and performance

of required inspections. Approximately 80 percent of the MSSWRs applicable to the activities described in paragraph 2 above could not be located. Records were not available to indicate that an initial inspection was performed of either the pressurizer support connections or the auxiliary building structural connection which was identified to be missing two welds.

MSSWRs were located for certain welds in four structural connections which indicated acceptable welds. However, reinspection of these four connections showed one undersized weld in one connection and undersized and overlenght weld returns in the four connections.

This is a Severity Level III Violation. (Supplement II.C)
Civil Penalty \$75,000

II. Violation Not Assessed a Civil Penalty

Criterion V of 10 CFR 50, Appendix B, requires that activities affecting quality shall be accomplished in accordance with appropriate instructions, procedures, and drawings, and that these instructions, procedures, and drawings contain appropriate quantitative acceptance criteria.

Bechtel Drawing E-1R8900, Revision 1, "Raceway Notes, Symbols and Details" states in paragraph 3.36.4 that:

"Minimum separation between different Class 1E conduit systems and minimum separation between Class 1E conduit systems and non 1E conduit systems shall be 1". Separation shall be measured between the outside edges of the conduit".

Bechtel Drawing E-01013(q), Revision 11, requires the following:

1. Paragraph 5.8.1.6 - "Within the control boards and other panels associated with protection systems, circuits and instruments of different separation groups shall be independent and physically separated horizontally and vertically by a distance of 6 inches".
2. Paragraph 5.8.3 - "Non-safety related circuits shall be separated from Class 1E circuits by the same distances applicable to Class 1E circuits of different groups".

Contrary to the above, the following activities affecting quality were not accomplished in accordance with appropriate drawings:

1. There were seven cases noted where conduit-to-conduit separation was less than one inch.
2. There were five areas in the control panels and cabinets where electrical cable separation was less than six inches.

This is a Severity Level IV Violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Kansas Gas and Electric Company is hereby required to submit to the Deputy Director, Office of Inspection and Enforcement, USNRC, Washington, D.C. 20555, with a copy to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including for each alleged violation: (1) admission or denial of the alleged violation; (2) the reasons for the violation, if admitted; (3) the corrective steps that will be taken and the results achieved; (4) the corrective steps that will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Within the same time as provided for the response required above under 10 CFR 2.201, Kansas Gas and Electric Company may pay the civil penalty in the amount of \$75,000 or may protest imposition of the civil penalty in whole or in part by a written answer. Should Kansas Gas and Electric Company fail to answer within the time specified, the Deputy Director, Office of Inspection and Enforcement, will issue an order imposing the civil penalty in the amount proposed above. Should Kansas Gas and Electric Company elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, such answer may: (1) deny the violations listed in the Notice in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty. In requesting mitigation of the proposed penalty, the five factors contained in section V.B of 10 CFR Part 2, should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of Kansas Gas and Electric Company is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalty due which has been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION


for Robert D. Martin
Regional Administrator

Dated at Arlington, Texas
this 21st day of November 1984