

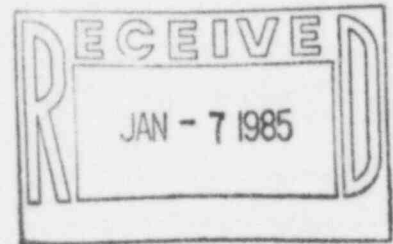


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

January 4, 1985

Mr. R.P. Denise, Director
Wolf Creek Task Force
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 85-006
Re: Docket No. STN 50-482
Subj: Response to Notice of Violation 50-482/84-49

Dear Mr. Denise:

This letter provide the Kansas Gas and Electric Company (KG&E) response to your letter of December 5, 1984, which transmitted Notice of Violation STN 50-482/84-49. As requested, the violations identified are being addressed in three parts:

- a) Corrective steps which have been taken and the results achieved;
- b) Corrective steps which will be taken to avoid further violations; and
- c) The date when full compliance will be achieved.

VIOLATION 482/8449-01: FAILURE TO PROTECT MATERIAL

10 CFR Part 50, Appendix B, Criterion II, states in part, ". . . the quality assurance program shall provide control over activities affecting quality Activities affecting quality shall be accomplished under suitably controlled conditions." The Wolf Creek Quality Assurance Program endorses ANSI N18.7-1976, which in Section 5.2.10 states in part, "Housekeeping practices shall be utilized Housekeeping encompasses all activities related to the control of cleanness of facilities, materials, equipment fire prevention and protection including disposal of combustible material and debris"

Contrary to the above, prior to November 2, 1984, Kansas Gas and Electric startup had approximately 16,000 pounds of activated

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charcoal in 150 pound fiber drums delivered to the 2047' level of the auxiliary building without applying appropriate fire protection compensatory measures. This constitutes failure to follow good housekeeping practices related to protecting material and equipment.

Response:

- a) Corrective steps which have been taken and results achieved:

The 150 pound fiber drums of activated charcoal located on the 2047' level of the auxiliary building were removed and returned to the warehouse for proper storage. The activated charcoal will remain in the warehouse until such time it is ready to be loaded into the air cleaning units.

- b) Corrective steps which will be taken to avoid further violations:

Startup personnel have been directed not to move charcoal from the warehouse to the power block until such time as it is needed to load the air cleaning units. At such time they will notify Operations of the move and are to follow the Wolf Creek Fire Protection Specialists' instructions for moving and handling the activated charcoal.

- c) Date when full compliance will be achieved:

Full compliance has been achieved.

VIOLATION 482/8449-02: FAILURE TO ADEQUATELY CONTROL TEMPORARY MODIFICATION

10 CFR Part 50, Appendix B, Criterion II states in part, ". . . The quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components, to an extent consistent with their importance to safety" Also, Section 17.2.0.3 of the Wolf Creek Addendum, Revision 13 to the SNUPPS Final Safety Analysis Report states in part, "The activities controlled by the operating quality program include pre-operational testing, startup testing, operations, maintenance, re-fueling, and modifications The extent of control over these activities as they affect quality is consistent with their importance to nuclear safety."

Contrary to the above, existing controls failed to prevent installation of a temporary modification which resulted in supplying water of inadequate

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quality to the seal injection line of each reactor coolant pump on or about November 6, 1984. This created potential contamination of the reactor coolant pump seals and radial bearings. If not corrected, seal contamination could cause deterioration which would allow increased seal leakage. This event constitutes a breakdown in implementation of the quality program.

Response:

- a) Corrective steps which have been taken and results achieved:

The unfiltered water supply to the seal injection for the Reactor Coolant Pumps (RCP) was isolated upon discovery. The temporary modification which resulted in the supplying unfiltered water to the seals was removed and the seals on RCPs A, B, C, and D were disassembled and inspected for contamination. The results of the inspection verified no contamination or damage to the RCP seals.

The radial bearings were also inspected using a boroscope and no contamination or damage was found. The seal injection lines to the four (4) RCPs are undergoing flushing at the present time.

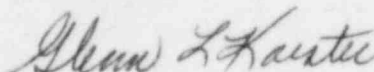
- b) Corrective steps which will be taken to avoid further violations:

The Startup organization has been directed to have all temporary modifications to the seal injection lines go through the System Lead Test Supervisor or his designee. Additionally, the operations Work Request Program has been placed in effect for all work groups at Wolf Creek per ADM 01-057, "Work Request".

- c) Date when full compliance will be achieved:

Full compliance has been achieved for the inspection of the RCPs seal and radial bearings. The flushing of the seal injection lines will be completed satisfactorily prior to fuel load.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

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