

NOV 15 1984

Docket: STN 50-482

Kansas Gas and Electric Company
ATTN: Glenn L. Koester
Vice President - Nuclear
P. O. Box 208
Wichita, Kansas 67201

Gentlemen:

This letter is to confirm the understandings reached during an enforcement meeting in the Region IV offices on October 29, 1984. The key points of understanding are as follows:

- ° Kansas Gas and Electric Company (KG&E) will proceed with all actions described in the KG&E letter and enclosures dated October 29, 1984 (Koester to Martin, KMLNRC 84-191). This included KG&E Corrective Action Request Number 19. Any changes to the program will be immediately reported in writing to this office.
- ° Corrective actions by KG&E will be completed, and a full report in accordance with 10 CFR 50.55(e) filed with and accepted by the Nuclear Regulatory Commission prior to issuance of a license to load fuel in the reactor.
- ° KG&E will provide an update of the organization chart showing individuals dedicated full time to this effort.
- ° KG&E will provide the basis and justification for sample selection, and the anticipated conclusions and rationale to support the conclusions, for any areas of this corrective action program where 100% reinspection/review is not performed.
- ° KG&E will provide clear acceptance criteria for all actions, and will identify and provide technical evaluations for any aspects of AWS D.1.1 not considered in this corrective action program.
- ° KG&E is committed to AWS D.1.1 - 1975 in the FSAR. If there are deviations from this commitment, KG&E is to identify these as FSAR changes for NRC review.

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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- ° KG&E will provide perspectives of the program by identifying the number of safety-related structural steel joints in various categories. This should include the total number of structural steel welded joints, the number of field welded joints, the number of shop fabricated joints, the number of bolted joints, the number of structural steel joints considered significant, and the number of joints reinspected under this program. This information should be displayed for each building which includes the safety-related structural steel.

During the above referenced meeting, the following preliminary concerns relative to KG&E Corrective Action Request Number 19 were expressed by NRC personnel:

- ° Is the selection of the welded connections to be reinspected under the program fully appropriate from a nuclear safety standpoint? Implicit within this concern is the need for justification for not reinspecting certain connections not reasonably accessible.
- ° Is the justification for acceptance of connections not in full compliance with existing requirements reasonable and appropriate from a nuclear safety standpoint?
- ° Can the connections be properly reinspected for compliance with requirements with coatings in place?

NRC staff personnel will discuss and evaluate these reservations in the offices of your engineer, the Bechtel Power Corporation, in the very near future. We will inform you of our conclusions at the earliest possible time.

A matter not discussed at our meeting of October 29, 1984, regards the development of information to demonstrate that the quality problem identified with structural steel has not affected other activities at the Wolf Creek Generating Station. We request that you provide Region IV with the results of inspections, investigations, and evaluations to demonstrate that the handling and disposition of CARs and quality assurance activities experienced in the structural steel area have not also had similar effects in other activities and disciplines. You should include this information with the information being provided to resolve the structural steel welding concerns.

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If our understanding of your planned actions described above is not in accordance with your actual plans and actions being implemented, please contact this office by telephone on (817)860-8100, within 24 hours.

Sincerely,

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R. D. Martin
Regional Administrator

cc:

Kansas Gas and Electric Company
ATTN: Gene P. Rathbun, Manager
of Licensing
P. O. Box 208
Wichita, Kansas 67201

Forrest Rhodes, Plant Superintendent
Wolf Creek Generating Station
P. O. Box 309
Burlington, Kansas 66839

bcc to DM& (IE36)

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