

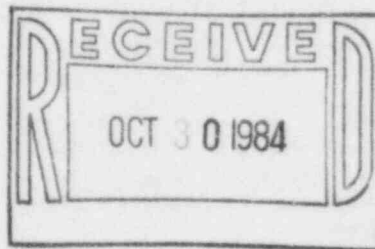


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

October 25, 1984

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 84-190
Re: Docket No. 50-482
Subj: Response to Inspection Report 50-482/84-20

Dear Mr. Denise:

This letter provides the Kansas Gas and Electric Company (KG&E) response to your letter of September 28, 1984, which transmitted Inspection Report STN 50-482/84-20. As requested, the violation identified in the Inspection Report is 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 482/84-20: FAILURE TO PROPERLY FOLLOW PROCEDURES

Finding:

Criterion V of Appendix B to 10 CFR Part 50 requires, in part, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings"

Startup Administrative Procedure Preoperational test program implementation (ADM 14-200) requires in part, that individual procedure steps within these subsections will be performed in the order in which they appear. Reordering of steps requires a TCN in accordance with Section 4.2, "Test Procedure Changes."

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G PDR

Contrary to the above, step 7.2.1 of preoperational test SU3-BG03 was not properly followed. Test personnel performed steps not stated in step 7.2.1, i.e., measurement of the closed/open stroke time, performing a fail safe test, and recorded data in Appendix F. It was later realized by the licensee that timed stroke measurements were required later in the test procedure under dynamic conditions. The test personnel then lined through all entries, then recorded fail safe test accomplishment incorrectly in test failed data sheet of the test procedure.

ADM 14-200 also requires, in part, that . . . "After all approvals, the TCN is sequentially numbered, and entered on the Test Change Notice Log."

Contrary to the above while performing preoperation test SU3-BG03 test change notice (TCN) 004 was not recorded in the TCN log.

ADM 14-200 also requires, in part, that, ". . . Preoperational test procedures may require modification . . . These modifications may be accomplished in . . . the following way (a) test change notices"

Contrary to the above, a test discrepancy was corrected in preoperational test SU3-BG03 by inserting a second verification/witness signature without processing a test change notice. Further, this discrepancy was not entered in the test chronological log.

Response:

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

On October 15, 1984, at 1200 hours a late entry was made in the Chronological Test Log for SU3-BG03, Revision 2. This entry describes the sequence of events and documents the actions taken to delete the data taken during static conditions and to record the proper data taken under dynamic conditions.

Test Change Notice 004 to SU3-BG03 was sequentially recorded in the Test Change Notice Log.

Test Discrepancy No. 009 was issued for step 7.2.13.14 of SU3-BG03 to document the insertion of a second verification/witness signature. Test Change Notice No. 005 to SU3-BG03 was issued to add the second signature witness line in step 7.2.13.14 resolving Test Discrepancy No. 009. A late entry was entered in the Chronological

October 25, 1984

Test Log identifying the issuance of Test Discrepancy
No. 009 and resolution of it by Test Change Notice
No. 005.

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

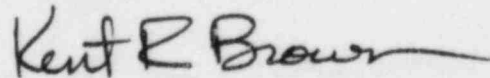
Training has been provided to all startup personnel
covering the requirements of the startup administrative
procedures. In addition, startup management has held
separate sessions with startup supervisory personnel
to stress their increased involvement in ensuring that
administrative requirements are adhered to.

- c) Date when full compliance will be achieved:

Full compliance has been achieved.

If you have any questions concerning this subject, please contact me or
Mr. Otto Maynard of my staff.

Yours very truly,



for Glenn L. Koester
Vice President - Nuclear

GLK:bb
xc:RCDeYoung
PO'Connor (2)
HBundy